

1 restaurant in Positano outdoors?

2 A. Yes.

3 MR. HARRISON: Just objection to form.

4 Compound.

5 But go ahead.

6 BY MS. RICHARDSON:

7 Q. Do you remember at that lunch Michelle and I
8 paid for the lunch?

9 MR. HARRISON: Objection to form.

10 Go ahead and answer.

11 THE WITNESS: I -- I don't recall that you paid
12 for that specific lunch. I do know that on the boat
13 trip, as all guests generally -- each guest would at one
14 point pick up a meal, and I do know you picked up a
15 meal.

16 BY MS. RICHARDSON:

17 Q. Yes. Were you aware that that meal cost just
18 under \$3,000?

19 A. No. If you picked it up and you didn't show
20 me, I wouldn't have been aware.

21 Q. Yeah. That's true.

22 A. Yeah.

23 MR. HARRISON: Excuse me. You got to stop
24 testifying, Ms. Richardson. Like, you can ask a
25 question; but you can't testify.

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1 MS. RICHARDSON: That's fair. I understand.

2 I'll -- I'll do a better job of trying to make sure the
3 form is correct.

4 BY MS. RICHARDSON:

5 Q. During that trip, we visited the South of
6 France and Italy; correct?

7 A. Yes.

8 Q. Okay.

9 THE WITNESS: Sorry.

10 MR. HARRISON: No. It's my fault.

11 THE WITNESS: I'm so sorry.

12 MR. HARRISON: It -- I'm getting slow. Just in
13 the future can you -- just a little bit, can you --

14 THE WITNESS: I'll be slow.

15 MR. HARRISON: For the rest of us, can you
16 specify time period -- what we're talking about.

17 MS. RICHARDSON: Sure.

18 BY MS. RICHARDSON:

19 Q. In the summer -- in July of 2021 do you
20 remember us going on a boat to the South of France and
21 Italy?

22 A. Yes.

23 MR. HARRISON: You may answer.

24 BY MS. RICHARDSON:

25 Q. Great. I'll -- I'm -- it will get better as we

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1 go. This is the fun thing about this, is that you --
2 you get better as you go, hopefully, or else we all --
3 anyway, try to leave the humor out of it.

4 Do you recall inviting me to join a second
5 yacht trip that was going to happen in Croatia
6 immediately following that?

7 A. Yes.

8 Q. Do you recall me expressing a desire to go
9 home?

10 A. I think you -- I think so. If that's the
11 moment where you wanted to go back to see your father.

12 Q. No. That was a different year.

13 A. Okay.

14 Q. It's okay. That was separate.

15 A. Okay. That you wanted to go home, I don't
16 recall. Sorry.

17 Q. Okay. That's fine. You don't have to recall.

18 Were you aware that on that trip -- let me --
19 let me -- I'm not going to go there.

20 Over the years we took several trips together;
21 correct?

22 A. Correct.

23 Q. Do you remember on several occasions when you
24 became ill that I stayed to take care of you?

25 A. I remember on one occasion, sure, because it

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1 was very memorable. It was one of the boat trips, and
2 it was -- I had a hangover, which was just miserable.
3 Not something one wants to do on a regular basis. So
4 yeah. You were very -- you were very kind. Very kind.

5 Q. Do you think that I had any resentment to be
6 taking care of you?

7 MR. HARRISON: Objection. Form. Calls for
8 speculation.

9 MS. RICHARDSON: That's fair.

10 THE WITNESS: No.

11 BY MS. RICHARDSON:

12 Q. Do you remember me staying back with you while
13 everybody else left to go on a day trip?

14 A. Yes. Yes, I do.

15 MS. RICHARDSON: Let's take a ten-minute break
16 so everybody can use the restroom, get something to
17 drink, and then we will circle back for the -- for the
18 next round. I know food is coming at some point.
19 Everybody's orders are coming, and this will just give
20 us to a minute to refresh. If food is here, we can
21 bring it in. Or -- you know, maybe we don't do that on
22 camera. Or we'll figure -- let me see.

23 THE VIDEOGRAPHER: Going off the record at
24 12:20.

25 (A recess is taken.)

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1 THE VIDEOGRAPHER: We are back on the record at
2 12:38. This is Media No. 2 in the deposition of
3 Ms. Taylor Thomson.

4 BY MS. RICHARDSON:

5 Q. Okay. Ms. Thomson, thank you. You got a
6 chance to take a break and -- let's resume our
7 conversation and go back a little bit. Actually, you
8 know, let's keep going forward.

9 So do you remember in April of 2021 us going on
10 a trip to Mexico?

11 A. Yes.

12 Q. Do you remember that while we were on that
13 trip, the price of Bitcoin was doing -- hitting an
14 all-time high? At that moment I think it was around
15 \$58,000.

16 A. I don't -- the timing on that -- I remember
17 when Bitcoin went -- when it went to 58, but I don't
18 remember a time.

19 Q. Do you remember --

20 A. I'll take your word for that one.

21 Q. -- being excited about crypto and Bitcoin
22 during that trip?

23 A. Yes.

24 Q. Okay. At that time do you remember me
25 mentioning to you that I had subscribed to a newsletter

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1 from Michelle Whitedove?

2 A. I do not recall whether that was the time.

3 I -- there was a time -- there was a time when you
4 mentioned it.

5 Q. During the time that Bitcoin started to do
6 better, is it correct that a lot of altcoins in the
7 crypto market were doing exceptionally well,
8 comparatively speaking?

9 MR. HARRISON: Objection to form. Calls for
10 speculation.

11 BY MS. RICHARDSON:

12 Q. Okay. Do you remember being excited about
13 altcoins around the same time of the Mexico trip?

14 A. I don't recall it coinciding with the Mexico
15 trip specifically, so --

16 Q. Let's just say --

17 A. So --

18 Q. -- that the spring to early summer of 2021,
19 roughly -- April to --

20 A. I can't -- I can't -- I can't say I actually
21 remember that timing.

22 Q. Okay.

23 A. I remember later in the summer. I don't
24 remember the earlier part when that was triggered.

25 Q. Understood. Do you remember you purchased --

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1 you began purchasing Ethereum in -- at -- were
2 purchasing Ethereum in May of 2021?

3 Q. Do you remember that?

4 A. I -- I don't remember the actual dates, but I
5 started buying Ethereum when I was with Anchorage.

6 Q. And do you remember writing to me about
7 Ethereum?

8 MR. HARRISON: Objection. Vague.

9 BY MS. RICHARDSON:

10 Q. Do you remember having conversations with me
11 about Ethereum on or about May to June of 2021?

12 A. I could -- I could not speak to the date. I
13 mean --

14 Q. Do you remember --

15 A. I was invested heavily in Bitcoin, and I also
16 had spread out into Ethereum, and so those were -- those
17 were my crypto -- that was my crypto world.

18 Q. And was Ethereum the first time you purchased a
19 cryptocurrency other than Bitcoin?

20 A. Yes.

21 Q. In May and June of 2021, you and I discussed
22 Ethereum and altcoins.

23 Q. Do you remember that?

24 A. I don't remember the actual date. You are the
25 one that brought up and -- brought altcoins onto my

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1 radar. I do know that. In terms of the actual day, I
2 couldn't tell you the actual day.

3 Q. That's fair.

4 A. Obviously, it was -- it was before I started
5 purchasing.

6 Q. Do you remember me mentioning that I subscribed
7 to the newsletter of a psychic, Michelle Whitedove?

8 A. Yes, I remember that.

9 Q. Do you remember that I subscribed to it not for
10 cryptocurrency?

11 A. Yes.

12 MR. HARRISON: Objection. Calls for
13 speculation.

14 Go ahead and answer, especially since you
15 already have.

16 THE WITNESS: Sorry.

17 BY MS. RICHARDSON:

18 Q. How about this. What do you remember about me
19 saying to you about Michelle Whitedove?

20 MR. HARRISON: Objection. Vague.

21 THE WITNESS: I -- I remember that you said
22 that you were -- you had been reading her newsletter
23 during COVID to see -- because you were interested in
24 people that had predicted COVID. Then you started
25 paying attention at one point to her altcoins.

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1 BY MS. RICHARDSON:

2 Q. At this point, when we had the conversation
3 about altcoins, is it fair to say the market had already
4 had a considerable run-up?

5 MR. HARRISON: Objection. Vague.

6 BY MS. RICHARDSON:

7 Q. In the spring of 2021 the crypto market had
8 increased considerably from where it had been the year
9 previous, in the beginning of COVID in 2020; correct?

10 A. Correct.

11 MR. HARRISON: Objection. Compound. Vague.

12 BY MS. RICHARDSON:

13 Q. The -- do you remember me sharing with you that
14 Michelle Whitedove had made predictions early in 2020
15 that did incredibly well? Let me rephrase that.

16 You have consulted astrologers and psychics in
17 the past; correct?

18 MR. HARRISON: Objection. Compound. Vague.

19 BY MS. RICHARDSON:

20 Q. You have construct -- you -- have you ever
21 consulted astrologers?

22 A. Yes.

23 Q. Have you ever consulted psychics?

24 A. Several times, but years ago.

25 Q. Okay.

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1 A. Not regularly. Astrology is something that I
2 follow and I'm interested in.

3 Q. And you have done a lot of work with Robert
4 Sabella; correct?

5 MR. HARRISON: Objection. Vague.

6 BY MS. RICHARDSON:

7 Q. In 2021 I shared predictions from Michelle's --
8 Whitedove's subscription newsletter with you; correct?

9 MR. HARRISON: Objection. Vague.

10 BY MS. RICHARDSON:

11 Q. In 2021 I shared Michelle Whitedove's altcoin
12 crypto predictions with you.

13 Do you remember that?

14 MR. HARRISON: You can answer.

15 THE WITNESS: I don't remember the actual date,
16 but I remember you -- you bringing it up, and at some
17 point I remember you printed -- I think you had showed
18 me a printout. I think you showed me something in
19 writing once --

20 BY MS. RICHARDSON:

21 Q. Yes.

22 A. -- a printout.

23 Q. At that time I think I also shared with you
24 that her top pick was a coin called Theta.

25 Do you remember that?

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1 A. I don't remember Theta --

2 Q. Okay.

3 A. -- specifically as her top pick.

4 Q. That's okay.

5 Michelle Whitedove had identified the coin
6 Theta in early 2022 as being a top performer, and it
7 went on to grow exponentially. I believe it was
8 something like a thousand x.

9 MR. HARRISON: Objection. Compound --

10 MS. RICHARDSON: Okay.

11 MR. HARRISON: -- leading. Calls for
12 speculation.

13 BY MS. RICHARDSON:

14 Q. Michelle Whitedove predicted in early 2020
15 Theta would do very well and -- and the returns were
16 very large.

17 Do you remember that?

18 MR. HARRISON: Objection. Compound. Leading.

19 BY MS. RICHARDSON:

20 Q. Okay. Go ahead and answer.

21 A. I -- I reread -- I just -- I reread her -- her
22 newsletter because I saw it in the pleadings.

23 Q. Uh-huh.

24 A. So I saw that. I don't specifically at the
25 time remember Theta. What I really more remember was

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1 Persistence.

2 Q. Right.

3 A. That was one she was thinking was going to be
4 significant. And having just read the newsletter, I --
5 I -- I know what she said.

6 Q. Do you remember -- Persistence was a relatively
7 new coin compared to other altcoins in the spring of
8 2021; correct? That's when it was introduced, in April
9 of 2021?

10 MR. HARRISON: Objection. Calls for
11 speculation. Compound.

12 THE WITNESS: Do I answer?

13 MR. HARRISON: If -- to the -- if you can,
14 yeah.

15 THE WITNESS: Yes.

16 BY MS. RICHARDSON:

17 Q. In May and June of 2021, I began doing research
18 on cryptocurrency after our Mexico trip.

19 Do you remember that?

20 A. Yes, I do.

21 THE WITNESS: Sorry.

22 MR. HARRISON: That's okay. That's okay.

23 Just --

24 THE WITNESS: Sorry.

25 MR. HARRISON: Wait a beat. Just wait a beat.

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1 BY MS. RICHARDSON:

2 Q. I shared with you the information I gathered
3 through my independent research and also through
4 Michelle Whitedove's predictions.

5 Do you remember that?

6 MR. HARRISON: Objection. Compound. Calls for
7 speculation. Assumes facts not in evidence.

8 BY MS. RICHARDSON:

9 Q. Okay. Let me rephrase the question. Just go
10 back a second.

11 Do you remember telling me that you followed
12 the advice of a psychic and -- and, as a result, bought
13 quite a bit of gold?

14 MR. HARRISON: Objection. Compound. Vague.

15 MS. RICHARDSON: You still answer it.

16 MR. HARRISON: To the extent -- to the extent
17 that you can, go ahead and answer it.

18 THE WITNESS: I -- I did buy -- I did buy gold
19 at one point, and I do know -- I do know a psychic who
20 was very keen on gold.

21 BY MS. RICHARDSON:

22 Q. And --

23 A. So, I mean, it's like it wasn't -- that wasn't
24 my sole decision as to whether to buy gold. I think
25 there were a lot of things that were -- the world was

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1 looking a little turbulent to me at that time, and it
2 was an opportune time because the world -- gold then
3 started moving.

4 Q. Understood. Now, I shared with you Whitedove's
5 prediction that Persistence XPRT -- she -- she stated in
6 her newsletter that Persistence XPRT was her -- her top
7 pick. Do you remember that?

8 A. I --

9 Q. Yeah.

10 MR. HARRISON: Go ahead.

11 THE WITNESS: I remember you shared that with
12 me, yes.

13 BY MS. RICHARDSON:

14 Q. You expressed interest in buying a number of
15 altcoins at that time.

16 Do you remember that?

17 A. I remember being -- I remember being -- having
18 my curiosity stoked because I recall you were of the
19 opinion that they were -- they were the next wave and
20 that there -- they were exponentially -- that -- because
21 it was obvious Bitcoin had moved a lot, and you thought
22 that they were the next wave of -- of the crypto world.

23 Q. Now, this is a good chance for me to kind of
24 pivot for a second.

25 You knew me at that point very well?

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1 MR. HARRISON: Objection. Compound. Calls for
2 speculation --

3 BY MS. RICHARDSON:

4 Q. You and I were -- you and I were close friends
5 in 2021; correct?

6 MR. HARRISON: You can answer, to the extent
7 you can.

8 THE WITNESS: Yes. Yes.

9 BY MS. RICHARDSON:

10 Q. Is it fair to say that you knew more about me
11 than most other people?

12 MR. HARRISON: Objection. Calls for
13 speculation. Vague.

14 BY MS. RICHARDSON:

15 Q. Would you consider me one of your closest
16 friends at that time?

17 A. Yes. I would have considered you one of my
18 closest friends.

19 Q. Is it safe to say that you knew that I was not
20 a financial professional?

21 A. Absolutely you weren't -- you -- you were not a
22 financial professional. You were just someone who was,
23 as you professed, down -- down the rabbit hole, and this
24 was just a world which was -- had actually become your
25 world because that's what you were doing all day long,

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1 as you said. I remember you were trading to try -- to
2 actually make a career at the end and make a good --
3 make money.

4 Q. I think --

5 A. And as a result, you were -- you seemed really
6 knowledgeable because that's all you did, you said.

7 Q. Do you remember me being interested in things
8 other than financial potential of crypto, but also
9 blockchain technology?

10 A. I -- I remember you feeling that it was of --
11 that it had a utility which Bitcoin did not have because
12 Bitcoin was a store of wealth, effectively.

13 Q. Yeah.

14 A. And this was the new world with platforms and
15 other -- other crypto directions.

16 Q. Do you remember me taking the predictions of
17 Whitedove but then using those predictions to do my own
18 research based on the projects she listed?

19 A. Yes.

20 MR. HARRISON: Objection -- objection.
21 Compound.

22 BY MS. RICHARDSON:

23 Q. Do you remember me -- we can break it into two.

24 Do you remember me looking -- taking -- looking
25 at Michelle Whitedove's advice, period?

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1 A. Yes.

2 Q. Do you remember me taking that advice and doing
3 my own research?

4 MR. HARRISON: Objection. Vague. Calls for
5 speculation.

6 MS. RICHARDSON: You can answer. You still
7 have to answer, but yes.

8 THE WITNESS: Do I answer?

9 MR. HARRISON: Well, you can answer to the best
10 of your -- if you knew what she did, if you can answer
11 that question.

12 THE WITNESS: From what I -- from what I
13 gathered from you, yes, you were studying extensively
14 crypto and that world because it was -- you were
15 dedicated.

16 BY MS. RICHARDSON:

17 Q. Now, do you remember -- we had dinners at Nobu
18 when you -- from -- from May to July it was -- it was
19 a -- there was a period of time.

20 Do you remember that?

21 MR. HARRISON: Objection. Vague.

22 BY MS. RICHARDSON:

23 Q. Do you remember us having dinner at Nobu in the
24 summer of 2021?

25 A. Yes. The summer of 2021, when I was in Malibu,

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1 that was the only place I would eat.

2 Q. Yes. And do you remember me telling you that I
3 was reaching out to crypto companies to see if I could
4 do some consulting for them as a trade because I didn't
5 have the means to invest?

6 MR. HARRISON: Objection. Compound.

7 BY MS. RICHARDSON:

8 Q. Do you remember me telling you I was reaching
9 out to several crypto companies to consult -- in hopes
10 of consulting?

11 A. Yes, I do.

12 Q. Do you remember that one of those crypto
13 companies was Persistence?

14 A. Yes, I do.

15 Q. Now --

16 THE WITNESS: Okay?

17 MR. HARRISON: That's fine.

18 THE WITNESS: I believe that was after -- after
19 we were -- after you were speaking to them about my
20 investment.

21 MS. RICHARDSON: No. Before. That's okay.

22 MR. HARRISON: Objection. You can't testify.

23 THE WITNESS: Sorry. I shouldn't have said
24 that.

25 MR. HARRISON: You can't really ask her

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1 questions either except to clarify her question. Okay?

2 THE WITNESS: Okay. Got it.

3 BY MS. RICHARDSON:

4 Q. When we first -- when I first mentioned
5 Persistence it was in relation to a large number of
6 altcoins that Michelle Whitedove had predicted could be
7 successful.

8 Do you remember that?

9 A. I -- to a certain extent. I predominantly -- I
10 predominantly remember your enthusiasm around
11 Persistence, but I do remember there was -- there was
12 definitely a long list, and it was Whitedove's list.

13 Q. Yes. And do you remember that my enthusiasm
14 about Persistence was because it had just launched
15 versus the other coins that had had a run-up?

16 A. Yes.

17 Q. Okay. Now, can we both agree that we went on a
18 vacation and were told we were not to speak of crypto?

19 A. I do recall that, yes.

20 Q. Okay. So is it safe to say that we went on
21 that vacation and did not speak of crypto?

22 A. I -- we went on that vacation. I don't know
23 whether we spoke of crypto; but we, I'm assuming, did
24 not speak at meals of crypto --

25 Q. Sorry.

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1 A. -- because that was the veto.

2 Q. Was the veto, yes. Sorry.

3 You came back from your trip to Europe directly
4 because you were having a medical issue.

5 Do you remember that?

6 A. Yes.

7 Q. When you came --

8 MR. HARRISON: I'm sorry. Just to clarify,
9 which trip are we talking about now?

10 MS. RICHARDSON: Sorry. 2021 -- summer of
11 2021, Italy, and then Taylor was coming back from
12 Croatia. I was already in Los Angeles.

13 THE WITNESS: Croatia. It was Croatia.

14 BY MS. RICHARDSON:

15 Q. Because you were coming back sooner than
16 expected, is it fair to say that your new home was not
17 ready?

18 MR. HARRISON: Objection to form. It's vague.

19 BY MS. RICHARDSON:

20 Q. Okay. Let's just -- let me just scrap that.
21 It's not important.

22 Can you --

23 A. Because I don't remember, actually, that it
24 wasn't ready.

25 Q. That's okay.

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1 You came back from Croatia to your new home in
2 Santa Monica on Channel Road; correct?

3 A. I can't say definitively. If it wasn't ready,
4 I wouldn't have probably come back to it. I don't
5 remember.

6 Q. Let me -- let me try this.

7 When you came back from Croatia, your Santa
8 Monica home was just getting ready; and together we went
9 out and bought carpets and other things to furnish the
10 home?

11 MR. HARRISON: Objection. Compound.

12 BY MS. RICHARDSON:

13 Q. When you first came back to Santa Monica, your
14 new home was ready; and because it wasn't furnished
15 yet -- that's still compound.

16 You came back to your home in Santa Monica;
17 correct?

18 A. Yes.

19 Q. Do you remember us going out and buying carpets
20 and furniture?

21 A. Yes.

22 Q. Do you remember that during that same time you
23 sent a list of altcoins to Robert Sabella to ask his
24 opinion?

25 A. The exact timing, I do not recall. I remember

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1 you asked me to -- you gave me a list that you wanted
2 Robert to -- to look at. I remember sending him a list
3 of things; and they were, I believe, what you had taken
4 from Whitedove; and you wanted to get his opinion on it.

5 Q. And do you remember at this time being excited
6 about his prediction -- or his assessment, rather?

7 A. I don't particularly remember being excited
8 about his assessment --

9 Q. You don't?

10 A. -- because it was just his opinion on
11 something.

12 Q. Understood. Before he made that opinion you
13 had discussed putting a small investment into
14 Persistence amongst other altcoins.

15 Do you remember that?

16 A. Yes. I remember -- I remember before -- before
17 he got the list, Persistence -- Persistence had been a
18 significant discussion all along, it seems to me, over
19 the boat trip as well -- that timing. Obviously, not at
20 dinners. I do remember it was, like, before.

21 Q. Okay. And do you remember that -- when you
22 talked about investing in Persistence, do you remember
23 me telling you not to invest more than \$500,000?

24 A. No.

25 Q. You don't remember that?

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1 A. No.

2 Q. You -- then I can assume you don't remember
3 that when I told you -- do you remember telling me that
4 that is why I would always be poor when I suggested you
5 not invest more than \$500,000 in Persistence?

6 MR. HARRISON: Objection. Vague. Assumes
7 facts not in evidence.

8 THE WITNESS: I -- no.

9 BY MS. RICHARDSON:

10 Q. You don't remember that?

11 A. No.

12 Q. Do you remember telling me --

13 A. That does not sound like anything I'd say.

14 Q. Other people were present for that
15 conversation.

16 MR. HARRISON: Objection --

17 BY MS. RICHARDSON:

18 Q. Okay. Do you remember shortly after that --
19 well, you don't remember the conversation; so let me --
20 let me rephrase the next question.

21 After Robert Sabella gave a favorable -- do you
22 remember Robert Sabella giving a numerical --

23 A. Yes.

24 Q. -- number for a number of different
25 cryptocurrencies?

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1 A. Sorry.

2 MR. HARRISON: You got to let her finish her
3 question. Don't cut her off.

4 THE WITNESS: Okay.

5 MR. HARRISON: Can you repeat the question.

6 BY MS. RICHARDSON:

7 Q. Do you remember Robert Sabella giving -- rating
8 a number of cryptocurrencies from 1 to 10, 10 being the
9 highest?

10 MR. HARRISON: Objection. Vague.

11 THE WITNESS: Yes.

12 BY MS. RICHARDSON:

13 Q. Do you remember Robert Sabella giving
14 Persistence a 10-plus rating?

15 A. I don't recall the actual number he gave it.

16 Q. After Robert Sabella rated Persistence as a
17 10-plus, you decided you wanted to purchase ten --
18 actually, I -- I -- let me -- sorry. Let me rephrase
19 that.

20 Do you remember after Robert Sabella made that
21 prediction and -- okay.

22 Robert Sabella made that prediction. On or
23 about the same time, Michelle Whitedove made a
24 prediction that the altcoin market was about to go up
25 again. Do you remember that?

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1 MR. HARRISON: Objection. Compound. Assumes
2 facts not in evidence.

3 THE WITNESS: I don't -- because I did not read
4 Whitedove's -- Whitedove's publication. I know you
5 showed me a printout of it once. So I don't remember --
6 I don't know what she was saying, but I do know that the
7 crypto -- at that point you had been really
8 investigating it and -- and the Persistence was very --
9 was what I recall the thing that you were most
10 enthusiastic about, about its potential and its upside.
11 But I don't know what Whitedove --

12 BY MS. RICHARDSON:

13 Q. Okay.

14 A. -- was saying. And Robert wasn't making a
15 prediction. He was reading the energetic on the
16 company.

17 Q. Yes. Now --

18 A. Because he's not a psychic, he's an
19 astrologist.

20 Q. Mike's -- great.

21 When the -- in your experience and based on
22 your knowledge, is it fair to say that the crypto market
23 is very volatile?

24 A. Yes.

25 THE WITNESS: Sorry.

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1 MS. RICHARDSON: In the -- in your --

2 MR. HARRISON: Objection. Calls for
3 speculation.

4 But she already answered, so --

5 BY MS. RICHARDSON:

6 Q. In your experience -- or in -- to the best of
7 your memory, Bitcoin had gone up considerably in -- in
8 April and May to about fifty -- a high of \$58,000 and --
9 this is a fact -- and then shortly after, while we were
10 in Europe, dropped, I believe, to the low thirties.

11 Do you remember that?

12 MR. HARRISON: Objection. Compound. Vague.
13 Assumes facts not in evidence.

14 To the extent you can answer it, can --

15 BY MS. RICHARDSON:

16 Q. Do you -- let me rephrase it.

17 Do you remember there being a crypto -- a
18 pullback of price -- all prices in the summer of 2021?

19 MR. HARRISON: Objection. Vague.

20 MS. RICHARDSON: You can answer.

21 MR. HARRISON: Can you clarify. All prices
22 of --

23 BY MS. RICHARDSON:

24 Q. Do you remember -- Bitcoin price had a
25 significant pullback in the summer of 2021 and altcoin

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1 prices even more so.

2 Do you remember that?

3 MR. HARRISON: Objection. Calls for
4 speculation.

5 But to the extent you -- you remember or can
6 answer that question, go ahead.

7 THE WITNESS: Regarding the altcoins, I don't
8 recall exactly what their pullback was; but I can tell
9 you I recall the Bitcoin falling off because it was a
10 Friday when it hit the 58; and I remember saying to you
11 I was going to sell it and you were like, Hang on for
12 the weekend. You said it's going to go up to -- over
13 the weekend, and then it dumped over the weekend.
14 That's why I remember -- whenever that happened I --
15 BY MS. RICHARDSON:

16 Q. I think -- you're thinking of the following --

17 A. Was that later?

18 Q. Yeah. Because --

19 A. Yeah.

20 Q. Because it went up and then it came down --

21 A. And then it went up.

22 Q. -- and then it went up.

23 A. That was later.

24 Q. So Michelle Whitedove, during that summer of
25 2021, during a pullback of the overall crypto market,

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1 said -- at that time there were many people who were
2 crypto enthusiasts on the Internet forecasting the
3 beginning of a bear market. Michelle Whitedove
4 contradicted that idea and said there's another run
5 coming. You and I discussed this prediction.

6 Do you remember that?

7 MR. HARRISON: Objection. Compound. Just
8 testifying instead of really asking a question.

9 MS. RICHARDSON: Okay. I understand.

10 THE WITNESS: I don't remember that -- that --
11 that conversation.

12 BY MS. RICHARDSON:

13 Q. Let me rephrase the question.

14 During a pullback of the cryptocurrency market
15 in the summer of 2021, do you remember me saying that
16 Michelle Whitedove was forecasting another run-up?

17 MR. HARRISON: Objection. Assumes facts not in
18 evidence. It's compound.

19 But to the -- if you understand the question,
20 you can answer it or both of them or whatever it is.

21 THE WITNESS: And I can't recall.

22 BY MS. RICHARDSON:

23 Q. That's fine. That's totally fair if you don't
24 recall.

25 Persistence, at its beginning, started off at a

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1 price of \$3 when it went onto the market; and it rapidly
2 rose to \$16 with a number other altcoins throughout the
3 month of May. During the summer pullback we just
4 discussed, it dropped to a price as low \$6.

5 Do you remember that?

6 MR. HARRISON: Sorry. I was zoned out. Can
7 you ask the question again. Sorry.

8 BY MS. RICHARDSON:

9 Q. Okay. So wait. Can I just say something --
10 can I say something, Taylor? Because this is important.

11 A. Okay.

12 Q. You can't -- so every time I ask a question --
13 it's not normal to get an objection for every question.
14 I understand that that's -- okay --

15 MR. HARRISON: So first of all, there's no
16 speak -- you can't make speeches. You can't --

17 MS. RICHARDSON: Okay.

18 MR. HARRISON: -- talk to my client like that.
19 You can't tell her how to do things. I mean --

20 MS. RICHARDSON: I can say -- I can say if --

21 MR. HARRISON: How can -- how many depositions
22 have you been at? How can you testify that this is --

23 MS. RICHARDSON: That's fair.

24 MR. HARRISON: -- irregular for a deposition?

25 MS. RICHARDSON: Is it fair for me to say on

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1 record to the Judge -- is it fair for me to say that if
2 there is not a -- an objection, your client should
3 proceed in answering the question?

4 MR. HARRISON: If there is not an objection,
5 that's correct.

6 MS. RICHARDSON: Okay.

7 MR. HARRISON: But she can turn to me and ask
8 me if -- if she wants to talk to me or consult with me.
9 You can't stop her from doing that.

10 MS. RICHARDSON: I'm not stopping her. I'm
11 just saying that --

12 MR. HARRISON: Can you please rephrase the
13 question because I didn't hear it.

14 MS. RICHARDSON: What I said was --

15 MR. HARRISON: Or re-ask the question. Sorry.

16 MS. RICHARDSON: Sure. Do you want to read it
17 back, actually, so I get the exact question because it
18 took me a while to get there.

19 (The record is read by the reporter as
20 follows:

21 "Q. Persistence, at its beginning, started off
22 at a price of \$3 when it went onto the market
23 and it rapidly rose to \$16 within a -- with a
24 number other altcoins throughout the month of
25 May. During the summer pullback we just

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1 discussed, it dropped to a price as low \$6.

2 "Do you remember that?")

3 MR. HARRISON: So my objection is compound.

4 It's especially -- essentially testifying rather than
5 asking a question.

6 If you understand the compound questions in
7 there, you can try your best to answer them.

8 THE WITNESS: What I do recall is -- I don't --
9 I don't specifically recall the -- where it moved --
10 surged forward and pulling back. I do recall later in
11 the summer it had -- it was down to around 6 because
12 that's around the time that -- that I purchased.

13 MS. RICHARDSON: Correct. When it was \$6 --

14 MR. HARRISON: I'm sorry. I just got to
15 object. You can't tell her whether her answers are
16 correct or not correct. You just ask the next question.

17 MS. RICHARDSON: Thank you. Thank you for
18 letting me know. I appreciate -- I do -- look, I will
19 be the first to say that there are some things that I
20 really -- it's -- it's a -- this is a skill, and I
21 understand that -- you know, I'm -- there's a lot of
22 pressure. There's also, you know, the being across from
23 this person who I was very close to that, you know, I'm
24 now suing and she's suing me.

25 So we're doing our best, all things considered.

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1 And if I make a mistake, I'm happy for you to let me
2 know, Mr. Harrison, truly. But -- but I also just want
3 to keep the flow of this going so we don't have to do
4 this again. That's my hope. Because, you know, as fun
5 as this is -- and -- at least it's a story. Nothing
6 else.

7 BY MS. RICHARDSON:

8 Q. Okay. At this point when there was a overall
9 pullback, you decided to begin making some purchases.
10 At this same -- sorry. This is compound, so I will stop
11 myself.

12 You decided to make some altcoin purchases;
13 correct?

14 MR. HARRISON: I'm sorry. Vague.

15 When are we talking about?

16 BY MS. RICHARDSON:

17 Q. In the month of August you decided to start
18 purchasing some about altcoins; is that correct?

19 MR. HARRISON: Sorry. August 2021, we're
20 talking about?

21 MS. RICHARDSON: Yes. Thank you.

22 THE WITNESS: Yes, that's correct.

23 BY MS. RICHARDSON:

24 Q. Okay. And at that time your Bitcoin was stored
25 with Genesis; is that correct?

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1 A. I -- I -- I didn't -- I didn't know that was
2 with Genesis. I thought -- I do -- at that time. I
3 started at Genesis, then it was moved over to Anchorage.

4 Q. At this --

5 A. The timing of it, I don't know. I'd have to go
6 back to my record.

7 Q. To the best of my memory, at that point,
8 because you shared with me some of the your crypto
9 information, Anchorage was holding your Ethereum and
10 Genesis was still holding your Bitcoin.

11 A. So that meant --

12 MR. HARRISON: Objection. Compound.

13 MS. RICHARDSON: Okay. Sorry.

14 MR. HARRISON: Testifying.

15 MR. ANDRE: It's not also a question.

16 MS. RICHARDSON: It's not a question, yeah.

17 It's -- you're right across the board. That was on me.
18 I'm just trying to give you context.

19 BY MS. RICHARDSON:

20 Q. In August of 2021 a large number of Bitcoin was
21 moved into a number of Ledger wallets.

22 Do you remember that?

23 MR. HARRISON: Objection. Vague. Compound.

24 BY MS. RICHARDSON:

25 Q. Let me -- let me go back.

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1 In August of '21, when you made the decision to
2 buy altcoins, we talked about it a lot.

3 Do you remember that?

4 MR. HARRISON: Objection. Vague. Compound.

5 To the extent you understand the question, you
6 can try and answer.

7 THE WITNESS: Around the time particularly of
8 the Persistence, we talked -- we definitely talked, and
9 I do recall things being sent to eight wallets.

10 BY MS. RICHARDSON:

11 Q. So let's rewind the tape even further than that
12 because you may or may not remember this, but we had a
13 discussion -- Anchorage was holding your Ethereum and at
14 that time had a limited capacity to purchase other
15 altcoins; is that correct?

16 MR. HARRISON: Objection. Compound.

17 You can answer.

18 THE WITNESS: Yes.

19 BY MS. RICHARDSON:

20 Q. Let me rephrase just for the record, make sure
21 the record is clear.

22 Anchorage was holding your Ethereum; yes?

23 MR. HARRISON: Sorry. Time period, please.

24 BY MS. RICHARDSON:

25 Q. In 2021 -- early 2021 Anchorage was holding

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1 your -- your Ethereum purchases?

2 A. I would have to check the records, but very --
3 around that window I moved everything over to Anchorage,
4 so Ethereum could have been there first.

5 Q. Do you remember us going through the list of
6 altcoins that Anchorage was able to purchase and hold at
7 that time?

8 MR. HARRISON: Objection. Vague.

9 You can answer.

10 THE WITNESS: I don't remember us going through
11 the list. What I do recall is there were not many
12 altcoins that they could support.

13 BY MS. RICHARDSON:

14 Q. And at that time do you remember us looking to
15 see if there was another Anchorage that existed that
16 could buy those altcoins?

17 MR. HARRISON: Objection. Vague.

18 THE WITNESS: Yes, I do remember. We were
19 looking to find other alternatives if there -- if there
20 was a place that was also -- would have had to have been
21 insured, like Anchorage is a crypto bank.

22 BY MS. RICHARDSON:

23 Q. Do you remember one of those -- one of those
24 outlets being -- I'll come back to that later.

25 Do you remember at that time there was not

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1 another such entity that existed that could execute that
2 purchase that we could find?

3 MR. HARRISON: Objection. Compound. Vague.
4 What time? You're saying --

5 MS. RICHARDSON: August of 2021.

6 MR. HARRISON: You can answer. Go ahead.

7 THE WITNESS: Yes. I do remember there was
8 nothing. There was nothing.

9 BY MS. RICHARDSON:

10 Q. Do you remember at that point the best option
11 was to purchase Ledger wallets for you to make those
12 purchases directly?

13 MR. HARRISON: Objection. Vague. Compound.
14 Calls for speculation.

15 BY MS. RICHARDSON:

16 Q. Do you remember purchasing a number of Ledger
17 wallets to purchase altcoins?

18 A. Yes. I --

19 MR. HARRISON: Objection. Vague. Go ahead.

20 THE WITNESS: Sorry.

21 BY MS. RICHARDSON:

22 Q. Do you -- you didn't -- okay.

23 A. Sorry.

24 Q. Do you remember me trying to teach you how to
25 use a Ledger wallet in your Santa Monica home?

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1 A. I -- I don't -- I remember seeing you using
2 one. I don't remember you trying to teach me because --

3 Q. There --

4 A. I just don't remember that exercise.

5 Q. There was a day in early August where I told
6 you only you can know these keys and so you have to look
7 at the little box and write them down.

8 Do you remember that?

9 MR. HARRISON: Objection to compound and
10 testifying.

11 But to the extent you can break that down and
12 try and answer it, go ahead.

13 THE WITNESS: I remember, which I already knew,
14 that you were -- I remember you showing me how the
15 wallets worked and the codes and writing them down.

16 BY MS. RICHARDSON:

17 Q. At that --

18 A. I don't recall that that was going to be me
19 custodying them because that's why I was at Anchorage,
20 for the --

21 Q. I understand.

22 A. -- the services.

23 Q. Well, at this point you wanted to buy altcoins
24 that Anchorage could not custody. So do you remember me
25 trying to teach you how to do this so you could custody

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1 it yourself?

2 Do you remember that?

3 MR. HARRISON: Objection to compound and
4 testifying.

5 To the extent you can break that down and
6 answer the question --

7 THE WITNESS: I don't recall -- sorry.

8 I don't recall you trying to teach me. I do
9 remember you, like, bringing the wallets and showing how
10 they worked. Or it was one of your wallets. I don't
11 know what it was. But I do remember you going through.

12 BY MS. RICHARDSON:

13 Q. We purchased wallets for you. I informed you I
14 did not want any access or information, so we went
15 through an exercise of setting up a wallet in your home.

16 Do you remember that?

17 MR. HARRISON: Objection. Asked and
18 answered --

19 MS. RICHARDSON: Okay. That's fair.

20 MR. HARRISON: -- compound. Vague.

21 BY MS. RICHARDSON:

22 Q. Do you remember, after we set up the first
23 wallet, I gave it to you and you lost it in the first
24 48 hours?

25 A. I --

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1 MR. HARRISON: Objection -- wait. Wait.

2 Objection. Compound. Testifying.

3 To the extent --

4 MS. RICHARDSON: Okay. That's fair.

5 MR. HARRISON: -- you can break down and
6 answer, go ahead.

7 THE WITNESS: I don't remember you giving me a
8 wallet, and I don't remember losing it. However, I
9 wouldn't be --

10 BY MS. RICHARDSON:

11 Q. Do you remember --

12 A. That's why I was at Anchorage, because that's
13 not something I would go near --

14 Q. Let me try --

15 A. -- manage --

16 Q. -- to jog your memory one more time.

17 Do you remember finding a wallet in your shoe?

18 A. No.

19 Q. Okay. Do you think -- based on what we just
20 discussed -- I understand you do not remember that --
21 those specific incidences. There were other people
22 present during that time, which is irrelevant.

23 But during that time, would -- would it make
24 sense that I would have wanted you to learn how to do it
25 at the -- at the beginning?

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1 MR. HARRISON: Objection. Compound. Calls for
2 speculation.

3 MS. RICHARDSON: Okay.

4 MR. HARRISON: I don't know that there's a
5 question pending. Is there -- are you keeping that
6 question or --

7 BY MS. RICHARDSON:

8 Q. Do you -- let -- let me ask you differently.

9 Do you remember --

10 A. I don't --

11 Q. -- on or about this time saying, Okay. Well,
12 clearly, you're going to keep them, or something to that
13 effect?

14 MR. HARRISON: Just so I understand, when you
15 say "this time," what time are we talking about?

16 MS. RICHARDSON: We -- okay.

17 We went through the exercise of trying to have
18 you set up crypto wallets. I -- okay. Let me just
19 abandon this ship for a minute.

20 I need to -- I need to. You're absolutely
21 right. I need to do a better job with my form on these,
22 and it's -- it's tricky.

23 BY MS. RICHARDSON:

24 Q. Around August of 2021, when you decided to
25 purchase Persistence, we moved Bitcoin onto eight Ledger

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1 wallets.

2 Do you remember that?

3 MR. HARRISON: Objection. Compound.

4 You can answer, if you can.

5 THE WITNESS: I remember the Bitcoin -- Bitcoin
6 was transferred to eight wallets, yes.

7 BY MS. RICHARDSON:

8 Q. Do you remember why it was transferred to eight
9 wallets instead of one?

10 A. Your -- you said that it was for security
11 reasons, to keep -- because it's -- not that you want to
12 lose one wallet --

13 Q. No.

14 A. -- but it was a lot -- it would have been a lot
15 to have on one wallet.

16 Q. And do you remember that when you decided to
17 buy Persistence, we reached out to them directly about
18 something called an OTC purchase, which is
19 over-the-counter?

20 MR. HARRISON: Well, objection to testifying.
21 Objection to compound.

22 To the extent you can break it down --

23 BY MS. RICHARDSON:

24 Q. Did you reach out to -- did you purchase
25 Persistence through a method which is called OTC?

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1 MR. HARRISON: What time period was that?

2 MS. RICHARDSON: In August of 2021.

3 THE WITNESS: Persistence -- my Persistence was
4 purchased by you negotiating with the company to do --
5 you know, to do a purchase from them so as not to just
6 destroy the stock value -- the coin value. So it went
7 right through directly to Persistence and from
8 Persistence.

9 BY MS. RICHARDSON:

10 Q. And it's fair to say that we -- you did not
11 purchase Persistence on the open market on an exchange,
12 but a direct purchase with the Persistence founders?

13 MR. HARRISON: Objection to form. Compound.

14 But to the extent you can answer it, go ahead.

15 THE WITNESS: Yes. I remember it was a direct
16 purchase, not through the -- not through the stock
17 market.

18 BY MS. RICHARDSON:

19 Q. Do you remember me having concerns, when they
20 sent over a purchase agreement, that it should be
21 reviewed?

22 MR. HARRISON: Objection. Vague.

23 To the extent you understand the question, you
24 can answer.

25 THE WITNESS: I don't recall that, no.

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1 BY MS. RICHARDSON:

2 Q. Persistence sent over a rather lengthy purchase
3 agreement at that time.

4 Do you remember that?

5 MR. HARRISON: Objection to the form of the
6 question. Testifying.

7 But go ahead, if you can answer.

8 THE WITNESS: No.

9 MR. HARRISON: Go ahead, if you -- you can
10 answer.

11 THE WITNESS: I don't remember -- I don't
12 remember them sending over a long, lengthy purchase
13 agreement. But for the record, it's very obvious with
14 any purchase like that, it would have to have been
15 reviewed, especially by a lawyer.

16 BY MS. RICHARDSON:

17 Q. At the time do you remember wanting to sign it
18 without having it reviewed?

19 A. No.

20 Q. At the time do you remember me saying to you,
21 You can't sign this unless a lawyer looks at it?

22 MR. HARRISON: Objection.

23 THE WITNESS: I don't remember you saying that,
24 but that's a given. Every -- everything I do that's a
25 large -- significant financial transaction like that is

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1 always, like, reviewed by a lawyer.

2 BY MS. RICHARDSON:

3 Q. Do you remember me reaching out to lawyers not
4 skilled in cryptocurrency that said they would not
5 review the contract because it dealt with
6 cryptocurrency?

7 MR. HARRISON: Objection. Calls for
8 speculation, I believe, to the extent I understand the
9 question.

10 THE WITNESS: No. But what I remember is
11 you -- you found -- you got a crypto special -- a crypto
12 lawyer.

13 BY MS. RICHARDSON:

14 Q. Do you know how I did that?

15 A. I don't recall how you did it. I'm assuming
16 you would have asked references.

17 Q. Google.

18 MR. HARRISON: Ms. Richardson, you can't
19 testify. If you have another question, you can ask the
20 question. You can't testify.

21 BY MS. RICHARDSON:

22 Q. That contract was reviewed by an attorney that
23 you hired prior to you signing it; correct?

24 A. Yes. I believe that was Dechert, was it?

25 Q. I believe so.

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1 You were made aware of -- you had already been
2 in the crypto market for some time at this point with
3 Bitcoin.

4 MR. HARRISON: Objection. Vague.

5 BY MS. RICHARDSON:

6 Q. Okay. There was a portion of that agreement
7 that specified the risk of cryptocurrency.

8 Do you remember that?

9 A. I would need to look at the agreement again,
10 but I --

11 Q. Okay.

12 A. -- think that would make sense.

13 Q. At the time you purchased Persistence, which
14 you were doing with Bitcoin, the Bitcoin and Persistence
15 prices were rising -- beginning to rise.

16 Do you remember that?

17 A. Yes.

18 Q. At the time you purchased Persistence, it was
19 \$6; but you were receiving a discount.

20 Do you remember that?

21 MR. HARRISON: Objection. Compound.
22 Testifying. Assumes facts not in evidence.

23 But if you remember that or if you can answer
24 the question, break it down, you can answer.

25 THE WITNESS: I don't recall it was exactly at

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1 \$6, but I -- I do recall that they -- that they
2 discount -- that they -- they gave a discount to the
3 market of \$5 -- \$5 for -- for our token.

4 BY MS. RICHARDSON:

5 Q. And who negotiated the discount for you?

6 A. You did. You negotiated everything.

7 Q. Do you remember, when you first decided to
8 purchase Persistence, at that time your investment was
9 to be less than \$10 million, that I was having some
10 financial trouble?

11 MR. HARRISON: Objection --

12 MS. RICHARDSON: Okay.

13 MR. HARRISON: -- vague. Compound.

14 Go ahead.

15 BY MS. RICHARDSON:

16 Q. Do you -- in August of 2021 you and I went to
17 dinner quite a bit; correct?

18 MR. HARRISON: Objection. Vague.

19 But you can answer, if you can.

20 THE WITNESS: Correct. If I -- if I were in
21 L.A., which I believe I was.

22 BY MS. RICHARDSON:

23 Q. And on one of those dinners, I asked you if it
24 would be okay if I kept aside a small portion of the
25 purchase that would only go to me if it saw value.

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1 Do you remember that?

2 MR. HARRISON: Objection. Compound. Vague.

3 To the extent you understand the question and
4 can answer it, go ahead.

5 THE WITNESS: I don't. I don't remember that,
6 no.

7 BY MS. RICHARDSON:

8 Q. Okay. I think I'm clear on that, by the way.

9 At that time your investment was set to be
10 relatively low, less than 10 million, compared to where
11 it ended up, high by most people's standards.

12 At the time we had the conversation over
13 dinner, you were going to invest less than \$10 million;
14 but you ended up investing more than that, did you not?

15 MR. HARRISON: Objection. Compound.

16 To the extent you understand --

17 MS. RICHARDSON: You're right -- you're totally
18 right on the compound part.

19 BY MS. RICHARDSON:

20 Q. Just after you signed the contract for your
21 purchase of Persistence, the price went up
22 substantially. I believe it went up from \$6 to \$8
23 before we did the first set of transfers.

24 Do you remember that?

25 MR. HARRISON: Objection. Compound. Vague.

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1 Assumes facts not in evidence.

2 To the extent you can break it down and try to
3 answer, you can do that.

4 THE WITNESS: I don't -- at the time I don't
5 specifically remember that it went up, but it would make
6 sense that I went up because I had purchased a
7 significant amount of the tokens.

8 BY MS. RICHARDSON:

9 Q. Were you aware --

10 A. It would follow. It would follow.

11 Q. Would -- were you aware that the structure of
12 your purchase, because it was such a large amount, was
13 done so that it would not impact the price point?

14 MR. HARRISON: Objection. Compound. Assumes
15 facts not in evidence. Calls for speculation.

16 To the extent you understand, you can answer.
17 Go ahead.

18 THE WITNESS: I was aware -- I was aware -- I
19 was aware that I was going directly to -- we were going
20 through Persistence directly and not on the market so as
21 not to create volatility and -- and -- and damage to the
22 value of the shares and alternate -- and falsely
23 alternate -- alter things.

24 BY MS. RICHARDSON:

25 Q. Now, this is important.

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1 Were you aware that the same week of those
2 purchases, before they took place, the coin was listed
3 on a relatively large crypto exchange called Huobi?

4 MR. HARRISON: Objection. Assumes facts not in
5 evidence. Compound.

6 To the extent you understand it and can break
7 it down and answer it, go ahead.

8 THE WITNESS: No, I wasn't aware. I don't
9 recall that name.

10 BY MS. RICHARDSON:

11 Q. And were you aware that when this coin launched
12 on this public chain, it dramatically increased the
13 price?

14 MR. HARRISON: Sorry. Vague.

15 When you say "this coin," which coin are you
16 talking about?

17 MS. RICHARDSON: Persistence. When Persistence
18 was launched on Huobi, that gave it an immediate price
19 jump.

20 MR. HARRISON: Objection. Compound. Assumes
21 facts not in evidence.

22 To the extent you understand question, you can
23 answer.

24 THE WITNESS: I don't -- I don't recall Huobi,
25 and I don't recall.

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1 BY MS. RICHARDSON:

2 Q. Okay. That's fine.

3 I -- now, as the price continued to rise, you
4 expressed interest to buy more Persistence. Do you
5 remember that?

6 MR. HARRISON: Objection. Assumes facts not in
7 evidence. Asks for -- calls for speculation.

8 To the extent you understand it, you can --

9 BY MS. RICHARDSON:

10 Q. In late August and September you expressed an
11 interest to buy more Persistence; correct?

12 A. Yes. It seems to me -- I thought it was almost
13 simultaneous to the first -- the first tranche but --

14 Q. Now, was this because the price was increasing?

15 MR. HARRISON: Objection. Vague.

16 THE WITNESS: It would be because I would have
17 been -- understood that this was a significant -- this
18 was a significant company that was going to have
19 traction down the road and be something serious in
20 the -- in the altcoin space.

21 BY MS. RICHARDSON:

22 Q. Understood. But it wasn't because the price
23 was increasing simultaneously?

24 A. I mean, the price increasing simultaneously
25 would have had a bearing on any decision as well.

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1 Q. Okay.

2 A. I think the overall decision -- the overarching
3 one was the -- was the value of the -- the actual
4 intrinsic value of the coin with the company and what
5 they were -- what they were all about, what -- the
6 direction they were going.

7 Q. And do you remember that on or about the same
8 time, I encouraged you to diversify your purchases to
9 coins other than Persistence?

10 MR. HARRISON: Objection. Vague.

11 To the extent you can -- you understand, you
12 can answer.

13 THE WITNESS: Yes. I understood you suggested
14 other coins as well.

15 BY MS. RICHARDSON:

16 Q. Do you remember what I said to you about
17 diversifying your purchases?

18 A. I don't remember what you said but -- which is
19 obvious, that it's -- it's always good to have a
20 diversified portfolio.

21 Q. Do you remember me ever expressing fear that
22 you were putting too much money into Persistence?

23 A. I don't recall.

24 Q. Do you remember repeatedly asking me, after you
25 had committed to purchase -- okay.

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1 You purchase -- you committed to purchase
2 \$40 million of Persistence; is that correct?

3 A. Yes, that's correct.

4 Q. Do you remember on or about that time you
5 wanting an additional \$20 million of Persistence?

6 MR. HARRISON: Objection. Vague.

7 But you can answer, to the extent --

8 BY MS. RICHARDSON:

9 Q. Bringing your total to 60 million?

10 A. I think I -- if I -- if I thought that, that
11 would have been a thought for -- for a moment maybe; but
12 obviously, it's not something I settled on as a
13 serious -- a serious thing.

14 Q. You -- you don't recall --

15 A. I don't actually recall thinking I would be
16 buying 60.

17 Q. You don't recall that?

18 A. Forty seemed -- forty was a good -- was a
19 serious position in the company.

20 Q. You don't recall asking me numerous times if we
21 could get the extra 20 Persistence?

22 MR. HARRISON: Objection to form.

23 BY MS. RICHARDSON:

24 Q. You don't recall, after we -- you committing to
25 \$40 million of Persistence, you repeatedly asking me to

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1 procure you an additional 20?

2 A. No.

3 Q. Do you remember me saying that it was not a
4 good idea and trying to tell you to buy something else
5 because your stake in Persistence was high?

6 MR. HARRISON: Objection. Asked and answered.
7 And compound.

8 MS. RICHARDSON: Okay.

9 THE WITNESS: Since I --

10 MR. HARRISON: I don't know if she is going to
11 withdraw the question, rephrase it, or what she's going
12 to do; so give her a chance.

13 BY MS. RICHARDSON:

14 Q. You repeatedly asked me to buy you an
15 additional \$20 million of Persistence.

16 Do you remember that?

17 MR. HARRISON: Objection. Asked and answered.

18 MS. RICHARDSON: Okay. That's fine. That's my
19 rephrase, for the record.

20 BY MS. RICHARDSON:

21 Q. Do you remember me expressing extreme concern
22 and telling you not to purchase an additional 20,000 --
23 \$20 million of Persistence?

24 MR. HARRISON: Objection. Asked and answered.

25 THE WITNESS: Because I don't recall ever

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1 thinking I wanted to buy another 20 and have it 60,
2 obviously, no, I would not recall you having a concern.

3 BY MS. RICHARDSON:

4 Q. Okay. During the same time period --

5 MR. HARRISON: Which time period?

6 BY MS. RICHARDSON:

7 Q. Summer of 2021 into fall of 2021, you began
8 purchasing a large number of NFTs.

9 Do you remember this?

10 A. The timing, I don't recall exactly; but I also
11 was collecting NFTs, yes.

12 Q. When you began to collect NFTs, is it correct
13 that you also stored them on small Trezor and Ledger
14 wallets?

15 MR. HARRISON: What was the -- what kind of
16 wallets?

17 MS. RICHARDSON: Trezor, T-r-e-z-o-r.

18 THE WITNESS: Trezor.

19 BY MS. RICHARDSON:

20 Q. Trezor.

21 A. Yes.

22 Q. Do you remember when you had your -- I don't
23 know his exact title -- IT professional Karan Dadwal
24 help you to make and hold those NFT purchases?

25 MR. HARRISON: Objection. Compound.

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1 To the extent you understand, you can answer.

2 BY MS. RICHARDSON:

3 Q. Do you remember having Karan help you with
4 those NFT purchases?

5 A. Karan was the one who put the monkeys onto the
6 Trezor wallets.

7 Q. And do you remember when Karan made a mistake
8 and lost the NFTs on the Trezor wallets?

9 A. Well, to clarify, he didn't -- sorry.

10 MR. HARRISON: I was going to object to
11 compound and vague.

12 But go ahead, to the extent you can answer.

13 THE WITNESS: To clarify his terminology, he
14 did not have the proper code to get back into the
15 wallet. He had not inputted them correctly.

16 BY MS. RICHARDSON:

17 Q. And --

18 A. In other words, he couldn't get back into the
19 wallet.

20 Q. I know.

21 And it's fair to say that he was very upset?

22 A. Oh, poor Karan. Yes, of course he was. Who
23 wouldn't be? Wasn't --

24 MR. HARRISON: There's no question pending.

25 Just let her ask her question. Wait for her.

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1 THE WITNESS: Okay.

2 BY MS. RICHARDSON:

3 Q. During that time period, your daughter and her
4 boyfriend became actively invested in NFTs as well;
5 correct?

6 MR. HARRISON: Objection. Vague. Compound.
7 To the extent you can answer, go ahead.

8 THE WITNESS: My daughter was also purchasing
9 NFTs. At what time exactly, I can't say specifically.

10 BY MS. RICHARDSON:

11 Q. Was her boyfriend also involved in those
12 purchases?

13 MR. HARRISON: Objection. Vague.

14 BY MS. RICHARDSON:

15 Q. Was her -- was Madeleine's boyfriend, Cameron
16 Moulene, actively engaged in the NFT marketplace?

17 MR. HARRISON: In what time period?

18 MS. RICHARDSON: During the period of summer
19 and fall of 2021.

20 THE WITNESS: Yes. Cameron -- Cameron was
21 collecting NFTs.

22 BY MS. RICHARDSON:

23 Q. Did he help you with your NFT purchases?

24 MR. HARRISON: Objection. Vague.

25 You can answer.

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1 THE WITNESS: Yeah. He -- he handled a few for
2 me, yes.

3 BY MS. RICHARDSON:

4 Q. Were you aware that he had a financial
5 instruction with -- financial arrangement with your
6 daughter, Madeleine, to purchase these NFTs?

7 MR. HARRISON: Objection. Vague.

8 To the extent you understand the question, you
9 can answer.

10 THE WITNESS: I could not -- I wouldn't have
11 the answer to that question.

12 BY MS. RICHARDSON:

13 Q. During this time period, I was holding custody
14 of these eight crypto wallets we spoke about earlier in
15 my home.

16 Do you remember this?

17 MR. HARRISON: During what time period?

18 MS. RICHARDSON: August 2021 into spring of
19 2022.

20 THE WITNESS: Yes. From -- from the -- from
21 the moment everything was in the wallets, you were
22 custodying them.

23 BY MS. RICHARDSON:

24 Q. And do you remember that during this time
25 period I started to have a lot of anxiety --

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1 MR. HARRISON: Objection --

2 MS. RICHARDSON: Let me rephrase the question.

3 BY MS. RICHARDSON:

4 Q. Do you remember me expressing anxiety about
5 holding the cryptocurrency in my home?

6 A. I remember you once mentioned that -- that you
7 were a little worried; and I think we chatted and it's,
8 like, there wasn't going to be really any genuine
9 concern. If there were, would have just taken it over
10 to my place.

11 Q. Do you remember saying to me that storing them
12 at my house was the perfect place because no one would
13 expect me to have that much money because I was so poor?

14 A. No. I would -- I remember having a discussion
15 that it would not be expected that you would -- that
16 anybody would be sitting on that much -- that much value
17 in their house, period. That was the point.

18 Q. Is it fair to say that when Karan lost those
19 NFTs through human error, it caused a lot of stress and
20 anxiety for him?

21 MR. HARRISON: Objection to form. Vague.

22 If you can answer -- if you think -- it calls
23 for speculation.

24 But if you think you can answer --

25 THE WITNESS: Karan was very sweet, and he was

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1 very worried that he'd lost them.

2 BY MS. RICHARDSON:

3 Q. I want to fast --

4 A. He was sad.

5 Q. I want to fast-forward a little bit based on
6 our -- our history and relationship.

7 Do you think I cared genuinely about your
8 well-being?

9 MR. HARRISON: Objection. Calls for
10 speculation.

11 You can answer, if you can.

12 THE WITNESS: You were one of -- you were one
13 of my closest friends, so it's implicit that you would
14 have cared for my well-being. One cares for one's
15 friends.

16 BY MS. RICHARDSON:

17 Q. Do you think that I wanted you to succeed?

18 MR. HARRISON: Objection. Calls for
19 speculation.

20 THE WITNESS: Yes.

21 BY MS. RICHARDSON:

22 Q. Do you think that when the crypto market began
23 to fall, similarly to Karan, that that would have
24 created a great amount of stress for me personally as a
25 result?

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1 MR. HARRISON: Objection. Vague. Calls for
2 speculation.

3 What time period are we talking about?

4 MS. RICHARDSON: We're now talking about
5 December 2021 into 2022. I would say it was a -- it was
6 a wide range.

7 MR. HARRISON: What's the question again?

8 MS. RICHARDSON: If it would have impacted me
9 to see that you were losing money.

10 MR. HARRISON: Objection. Vague. Calls for
11 speculation.

12 If you can -- you can answer it, give it a
13 shot.

14 BY MS. RICHARDSON:

15 Q. Reasonably --

16 A. Yeah. I could not -- I could not presume to --
17 to say how you would have felt. If it were me, I would
18 have felt badly.

19 Q. Were you aware that on or about December 21,
20 '21, I stopped sleeping consistently?

21 MR. HARRISON: Objection. Calls for
22 speculation.

23 MS. RICHARDSON: Okay.

24 THE WITNESS: No, I was not.

25 ///

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1 BY MS. RICHARDSON:

2 Q. I helped you with your Persistence purchase in
3 August of 2021 and discussed the possibility of a
4 finder's fee, but at that point we did not discuss me
5 holding the custody of your crypto or helping you with
6 further purchases; is that correct?

7 MR. HARRISON: Okay. Objection.

8 MS. RICHARDSON: Sorry. That was compound.
9 Yep. That was --

10 MR. HARRISON: Multiple -- assumes facts not in
11 evidence.

12 MS. RICHARDSON: Totally. Okay.

13 MR. HARRISON: Asked and answered.

14 BY MS. RICHARDSON:

15 Q. In August of 2021 we had not discussed me -- at
16 any time me holding the custody of your cryptocurrency;
17 is that correct?

18 MR. HARRISON: Objection. Vague.

19 If you think you can answer, go ahead.

20 MS. RICHARDSON: Let me --

21 THE WITNESS: I didn't --

22 MS. RICHARDSON: I'll rephrase it.

23 MR. HARRISON: Why don't you rephrase --

24 THE WITNESS: I don't recall when it was --

25 once the crypto -- once Persistence was bought and the

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1 wallets -- everything was sent to the wallets, my
2 recollection is it was always understood that you would
3 be custodying those wallets.

4 BY MS. RICHARDSON:

5 Q. Okay. Let me ask you this.

6 Did we at any time have any formal agreement?

7 A. No.

8 Q. Did we at any time -- at any time was I
9 compensated financially for -- for this --

10 MR. HARRISON: Objection --

11 BY MS. RICHARDSON:

12 Q. -- for helping you with your cryptocurrency?

13 MR. HARRISON: Objection. Vague.

14 Compensated by who?

15 MS. RICHARDSON: By Taylor.

16 BY MS. RICHARDSON:

17 Q. Was I -- was I -- was I your representative and
18 did you pay me for the help I was giving you with
19 cryptocurrency?

20 MR. HARRISON: Objection. Compound.

21 THE WITNESS: You were -- you were advising --
22 I did not pay you or you would not have been objective,
23 obviously. And you were -- you were -- you were my --
24 my consultant. You were the person that I was -- I was,
25 like, working with, listening to. And no, there was

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1 no -- there was no salary.

2 At the time I remember you being excited
3 because of all of the opportunities you felt that you
4 were going to have, like Tushar and Persistence said you
5 could -- you were hoping to be able to work for them and
6 that this would be opening a world for you that wouldn't
7 have happened with just buying a few thousand of coins
8 here and there.

9 BY MS. RICHARDSON:

10 Q. And it would make sense then, if I had an
11 upside in the coin you were heavily invested over time,
12 that I would be more invested in that; is that correct?

13 MR. HARRISON: Objection. Compound. Calls for
14 speculation.

15 THE WITNESS: Yeah -- hypothetical. I
16 couldn't -- I mean --

17 MS. RICHARDSON: That's fine. You don't have
18 to answer.

19 THE WITNESS: I don't --

20 MS. RICHARDSON: Let me -- let me think --

21 MR. HARRISON: Don't answer hypotheticals.

22 BY MS. RICHARDSON:

23 Q. Let me think of a better -- let me think of a
24 better way to phrase it.

25 I expressed to you that the crypto purchases

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1 became much more time-consuming than I expected.

2 Do you remember that conversation?

3 MR. HARRISON: Objection -- bless you.

4 THE VIDEOGRAPHER: Thank you.

5 MR. HARRISON: Vague.

6 Do you have a time period on this?

7 MS. RICHARDSON: Yeah.

8 BY MS. RICHARDSON:

9 Q. On or about, I would say, September of 2021 to
10 November 2021, you continued to make a large number of
11 purchases in altcoins.

12 Do you remember this?

13 A. Yes. I remember November very, very clearly,
14 we had lunch at Toscana, which was before Thanksgiving
15 in 2021, where you had a -- you said to me you were
16 feeling that it was an unevil -- uneven relationship,
17 that you weren't being compensated, it was taking far
18 too much of your time and your energy, and you wanted me
19 to loan you a hundred thousand dollars and then you said
20 that you would -- you would make -- a 10 percent
21 commission it would give to me and then you would keep
22 the difference.

23 And at that point I remember saying I didn't
24 want to risk messing up our friendship with -- with
25 finances -- with financials; and also, that's when I

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1 told you that I was going to be moving to England, which
2 you already knew --

3 BY MS. RICHARDSON:

4 Q. Uh-huh.

5 A. -- but that everything would have to be
6 custodied offshore. It was around November that I told
7 you that they had to go -- everything had to go to a
8 professional crypto bank.

9 Q. And do you remember me having concerns about
10 that?

11 A. What --

12 MR. HARRISON: Objection. Vague.

13 Concerns about what?

14 BY MS. RICHARDSON:

15 Q. Sorry. Do you remember me having concerns
16 about the custody changing?

17 MR. HARRISON: Objection. Vague.

18 If you think you under -- if you do understand
19 it somehow, you can answer.

20 THE WITNESS: I know you reacted very strangely
21 when I said that I was going to need the wallets back
22 because they were going to have to be custodied by a
23 professional custody company.

24 BY MS. RICHARDSON:

25 Q. Do you have any sense of why I was concerned?

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1 A. At the time it --

2 MR. HARRISON: Objection. Assumes facts not in
3 evidence.

4 That's not what the testimony was but --

5 THE WITNESS: At the time it seemed very
6 strange because you had been saying for a while how much
7 work this was for you and how much time it was taking up
8 with your life, which is why I thought in November, when
9 I said, Don't worry. I'm taking the wallets back. You
10 will not have to be -- have to be spending all this
11 time, I thought you would be relieved. But you had just
12 a -- you had a strange reaction. You kind of --

13 BY MS. RICHARDSON:

14 Q. Do you -- and -- and you --

15 A. -- startled and you were thrown off.

16 MR. HARRISON: Let her finish.

17 MS. RICHARDSON: Okay.

18 THE WITNESS: You were just thrown off; and it
19 wasn't the happy reaction I would have thought of
20 someone who was, you know, feeling oppressed by having
21 to manage all these wallets. I thought you would be
22 happy to be -- to -- to be able to be free of that
23 responsibility.

24 BY MS. RICHARDSON:

25 Q. And I want you to tell me, because I think that

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1 there was some conclusions that came to you at this
2 time, what do you think my concern was?

3 MR. HARRISON: Objection. Calls for
4 speculation. I don't know how she would be expected to
5 answer that.

6 BY MS. RICHARDSON:

7 Q. Okay.

8 A. I couldn't -- it didn't make any sense to me.
9 It didn't make any sense to me because I knew you were
10 feeling you were putting far too much time into
11 managing --

12 Q. That's true.

13 A. -- the crypto and that it was becoming too much
14 of a burden, which is why it was -- I just thought you
15 would be happy when I said I needed the wallets back.

16 Q. Do you remember me expressing specifically that
17 the concern was related to the staked assets and that
18 they could not just be moved?

19 Do you remember having that conversation?

20 MR. HARRISON: Objection. Compound. Vague.

21 If you think you understand it, you can break
22 it down, go ahead.

23 THE WITNESS: I do. I remember -- I remember
24 having the -- the conversation around the staked --
25 while it seems to me that because everything was locked

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1 over at Persistence or something, there was a technical
2 reason why that would not -- why that would have been
3 inopportune to move them over to England. And in -- I
4 don't recall your concern about the staking; but it
5 would make common sense, just like Anchorage couldn't
6 stake.

7 BY MS. RICHARDSON:

8 Q. Do you remember me telling you specifically
9 that it would be a breach in the term of your purchase
10 agreement?

11 MR. HARRISON: Objection. Vague.

12 That what would be a breach?

13 MS. RICHARDSON: Moving them off of the staked
14 wallets.

15 MR. HARRISON: Which coins are we talking
16 about?

17 MS. RICHARDSON: Persistence now specifically.

18 THE WITNESS: I recall -- I recall that
19 conversation because it was -- the conclusion was, at
20 least in my -- from my recollection, that Tushar would
21 have to give a go-ahead for it and accommodate it
22 because it was a technicality that had to happen before
23 the British -- British tax year, before -- before
24 April 5th.
25 ///

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1 BY MS. RICHARDSON:

2 Q. Were you aware that when you purchased
3 Persistence, Tushar had extreme reservation about the
4 size of purchase you wanted to make?

5 A. Yes. You told me.

6 Q. Do you know why he would have had reservations
7 about the size of the purchase that you wanted to make?

8 A. Because he --

9 MR. HARRISON: Objection. Calls for
10 speculation.

11 If you know, you can answer.

12 THE WITNESS: My understanding was that he was
13 concerned that someone that would control that much --
14 have as many tokens as that could do something
15 nefarious --

16 BY MS. RICHARDSON:

17 Q. Now --

18 A. -- to his -- to his token -- someone with an
19 ill agenda.

20 Q. Is it fair to say that when you purchased
21 Persistence it was still something that would be
22 considered, in crypto terminology, a micro-cap or a
23 cryptocurrency with a very small overall market cap?

24 MR. HARRISON: Objection. Compound. Calls for
25 speculation.

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1 If you think you understand it, you can answer.

2 THE WITNESS: I was aware that it was a small
3 coin, but this was -- this was your area of all the --
4 you know, the -- you know, the understanding in the --
5 you know, the knowledge on everything. But it was
6 common sense that it was a small company, small coin.

7 MS. RICHARDSON: Were you --

8 MR. HARRISON: I'm going to need a bathroom
9 break relatively soon --

10 MS. RICHARDSON: Totally fine. Let me just
11 finish this one point and then we can go because we're
12 -- this -- I just want to get to the end of -- if that's
13 okay, and -- is five minutes okay?

14 MR. HARRISON: Yeah, that's fine.

15 MR. ANDRE: Can we do --

16 MS. RICHARDSON: We'll do a lunch break.

17 MR. ANDRE: Finish your question, we'll go off
18 the record.

19 BY MS. RICHARDSON:

20 Q. Okay. Were you aware that unstaking such a
21 large amount in -- in a transfer could dramatically
22 alter the price of Persistence?

23 MR. HARRISON: Objection. Vague.

24 What time are we talking about? What time --

25 MS. RICHARDSON: This is in -- I believe it was

1 November of 2022.

2 BY MS. RICHARDSON:

3 Q. The reason the contract was signed and the
4 assets were committed to be staked was to not move the
5 price substantially.

6 Were you aware of that?

7 A. Yeah. Well, I -- I -- my understanding was
8 that everything was being left over with -- with
9 Persistence so they had sort of more control of it. And
10 the staking, the idea was that it would be compounding
11 my returns and the -- and one was -- I was meant to be
12 getting greater returns from staking versus not staking
13 it. The whole point -- it seemed to me much of the
14 point of the whole thing was not staking it.

15 BY MS. RICHARDSON:

16 Q. But you were not aware that if you were to
17 unstake a very large amount at one time, it could
18 dramatically impact the price?

19 A. No.

20 Q. And you were not aware that at that time when I
21 expressed concern, it was that it could dramatically
22 impact the price and also that you would be in breach of
23 your agreement?

24 MR. HARRISON: Objection. Compound.

25 ///

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1 BY MS. RICHARDSON:

2 Q. You were not aware --

3 MR. HARRISON: Calls for a legal conclusion.

4 You can answer.

5 BY MS. RICHARDSON:

6 Q. -- that my concern may have been that this
7 could have a catastrophic impact on not only the coin,
8 but on your investment?

9 MR. HARRISON: Objection. Compound. Calls for
10 speculation.

11 BY MS. RICHARDSON:

12 MS. RICHARDSON: That's fair.

13 THE WITNESS: And no, I wasn't aware.

14 MS. RICHARDSON: Okay. Why don't we take a
15 lunch break.

16 THE VIDEOGRAPHER: Going off the record at
17 1:57.

18 (A lunch recess is taken.)

19 THE VIDEOGRAPHER: We are back on the record at
20 1:31 -- sorry -- 2:31. This is Media No. 3 in the
21 deposition of Ms. Taylor Thomson.

22 BY MS. RICHARDSON:

23 Q. Okay. Hi.

24 A. Hi.

25 Q. I will circle back just for a minute where we

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1 left off, and then we're going to -- oh, and my
2 microphone -- and then we're going to pivot.

3 So we were just talking about when you made a
4 decision to move the custody of your crypto and what
5 that could mean. I want to go back a little bit because
6 you mentioned that you thought it would be good for me
7 because it would take a lot off my plate; correct?

8 A. Yes.

9 MR. HARRISON: Objection.

10 When are we talking about? What are we talking
11 about?

12 MS. RICHARDSON: Just say --

13 THE WITNESS: Moving and --

14 MR. HARRISON: The statement she just made,
15 like, in the deposition?

16 MS. RICHARDSON: Yes.

17 MR. HARRISON: The one where we -- before --

18 MS. RICHARDSON: On the record, yes. Yes.
19 Sorry. Yes. Not the -- no. No. Not referring to
20 this.

21 THE WITNESS: Moving the Persistence --

22 BY MS. RICHARDSON:

23 Q. Yes.

24 A. -- over to Saffery's.

25 Q. Yes. So --

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1 THE VIDEOGRAPHER: Could we have your mic --

2 BY MS. RICHARDSON:

3 Q. Do you remember a few months prior to this I
4 told you I definitely can't keep this in my home, it's
5 not safe, but especially so if it were to go up
6 substantially -- that was the bigger fear, if it were to
7 keep going up?

8 A. I don't remember that.

9 Q. That's okay.

10 MR. HARRISON: Objection. Compound. Vague.

11 BY MS. RICHARDSON:

12 Q. That's fair.

13 You had a large of amount of crypto assets on
14 those eight Ledger wallets in 2021; is that correct?

15 A. Yes.

16 Q. Do you recall -- the -- the crypto that was on
17 those wallets, at that point in time Anchorage did not
18 have the capacity to custody those coins; is that
19 correct?

20 A. That's correct. That's why I had the wallets.
21 I'm --

22 Q. Do you -- do you remember me reaching out to --
23 do you remember when we realized that Anchorage was
24 using the Ledger vault system to custody your crypto?

25 Do you remember us ever having that

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1 conversation?

2 A. Vaguely familiar. That they were using --
3 wait. That Anchorage was using crypto wallets -- was
4 using wallets to store my crypto at Anchorage?

5 Q. They were using something similar to a larger
6 version of a wallet. It was a version of a Ledger.

7 A. Okay. Rings a bell.

8 MR. HARRISON: I'm sorry. Is there a
9 question --

10 MS. RICHARDSON: Yes. I'm getting there.

11 MR. HARRISON: -- or is there a statement?

12 BY MS. RICHARDSON:

13 Q. Sorry. I'm trying to give some -- some
14 groundwork that -- Ledger vault had the capacity to be
15 insured because it had multi-sig authorization required
16 to access the funds.

17 Does that ring a bell?

18 A. Okay. Anchorage -- I remember. Anchorage
19 had -- are you -- maybe I'm not getting this right.

20 Q. It's all right.

21 A. Anchorage had the three -- three-person
22 authentication.

23 That's different, or that's the same?

24 Q. That's different than a regular Ledger wallet,
25 yes.

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1 A. Right. And that was to do the trades there.

2 Q. And can you see how the multi-signature
3 protects the crypto more than if just, say, one person
4 has a wallet?

5 MR. HARRISON: Objection. Vague. Calls for
6 speculation.

7 BY MS. RICHARDSON:

8 Q. Okay. Anchorage offered, at the time,
9 insurance on your cryptocurrency; is that correct?

10 A. That is correct, yes.

11 Q. Do you remember us wanting to create a similar
12 structure for your other altcoins so that they could be
13 insured?

14 A. Yes. I remember us wanting to find
15 professional Ledgers and more industrial Ledgers, and I
16 don't recall whether they were going to be insured, but
17 they -- my recollection is that they were going to be
18 more -- more serious -- more substantial and, therefore,
19 probably safer.

20 Q. Around this time do you remember that I reached
21 out directly to the Ledger foundation and started having
22 conversations with them about the cost of having a
23 Ledger vault for you separate from Anchorage?

24 A. I remember you reaching out -- I thought it was
25 to the company and -- to the company that made the

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1 Ledger -- the professional Ledger vault to see if we
2 could get a Ledger vault. I do not recall that it --
3 because they were -- I just -- that's -- that's what I
4 remember.

5 Q. Do you recall me telling you after I had that
6 conversation that they would be willing to, based on the
7 size of your investment, build the capacity within the
8 Ledger vault to stake your assets and still have it be
9 insurable?

10 A. Was this --

11 MR. HARRISON: Objection. Compound. Vague.

12 MS. RICHARDSON: Okay. That's fair.

13 BY MS. RICHARDSON:

14 Q. Do you remember me talking to the Ledger folks
15 about creating a structure that would hold all of your
16 crypto assets, including NFTs and small-cap altcoins?

17 A. I remember the -- that was the -- that was the
18 agenda. I don't remember you actually speaking -- I
19 remember you -- you were looking -- you were looking
20 into them and that was the idea to keep them safe but
21 still able to be stakes -- staked.

22 Q. And do you remember that we ran a cost analysis
23 and it was clear that it would actually save you a
24 considerable amount of money to build your own vault
25 that was insurable than to keep it -- your crypto

1 custodied at Anchorage?

2 MR. HARRISON: Objection. Compound.

3 MS. RICHARDSON: Okay. That's fair.

4 BY MS. RICHARDSON:

5 Q. Do you remember us -- okay.

6 Do you remember that you were paying Anchorage
7 a fee to custody your assets? You paid Anchorage a fee
8 to custody your assets -- correct? -- a percentage?

9 A. That sounds -- since -- I'm so sorry.

10 Q. It's okay.

11 A. Because I remember the first one was -- at
12 Genesis didn't charge anything. I don't remember if and
13 what Anchorage charged.

14 Q. That's okay.

15 A. I know I was getting nothing when it was at
16 Genesis, but they also weren't insured. I -- I'd have
17 to go back and look at the -- the contract, but I'll
18 take your word for it.

19 Q. Anchorage had a limited capacity in relation to
20 the coins that they can could custody at that time.

21 Do you remember that?

22 A. Yes, I remember that.

23 Q. And when I spoke to -- when it became clear
24 that Ledger vault was the same as what Anchorage was
25 using -- yeah -- we ran a cost analysis of which would

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1 be more favorable to you.

2 Do you have any memory of that?

3 A. Vague. And it -- vague. And it would make
4 sense. It would follow.

5 Q. What seemed at the time favorable for you and
6 Persistence was that if you were to build this type of a
7 vault, it would allow people to purchase the coin in
8 large numbers and keep it insured.

9 Do you remember that?

10 MR. HARRISON: Objection. Compound. Calls for
11 speculation.

12 THE WITNESS: I -- I don't remember that, but I
13 think I might be -- what I remember, I -- is -- I think
14 my understanding of what you're saying is -- maybe I'm
15 confusing this --

16 BY MS. RICHARDSON:

17 Q. That's okay.

18 A. -- was a node.

19 Q. That's separate.

20 A. A node -- that's separate. So -- so I don't --
21 I don't -- sorry. I don't remember specifically.

22 Q. It's fair to say, though, regardless, this was
23 an active conversation that never materialized; correct?

24 MR. HARRISON: Objection. Vague --

25 ///

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1 BY MS. RICHARDSON:

2 Q. Okay. Do you remember that these conversations
3 were ongoing at the time you made a decision to move
4 your assets to Saffery's?

5 MR. HARRISON: Objection. Vague.

6 What -- when you say "these conversations,"
7 what --

8 BY MS. RICHARDSON:

9 Q. Do you remember that the conversations with
10 Ledger vault -- is it fair to say that I was very
11 concerned that your crypto was secure?

12 MR. HARRISON: Objection. Calls for
13 speculation.

14 MS. RICHARDSON: Okay. That's fair. Let's
15 just -- let me just pivot for a second, and we'll come
16 back to that. Let's -- let's table it for a minute, and
17 we'll -- we'll jump to a different topic. We'll come
18 back.

19 BY MS. RICHARDSON:

20 Q. We are going to move -- fast-forward and we
21 will go back to this period of time, which is a hard
22 period of time for both of us to discuss, I think.

23 Okay. You and I stopped communicating at the
24 beginning of June of 2022; is that correct?

25 MR. HARRISON: Objection. Vague.

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1 You can answer, if you can.

2 BY MS. RICHARDSON:

3 Q. The last time I received communication --
4 direct communication from you was in June of 2022.

5 Does that sound about right?

6 A. Yes. At -- the last time. Before that,
7 everything had slowed down over this point, the New
8 Year's through the summer --

9 Q. Uh-huh.

10 A. -- in general. Communication slowed down very
11 much from, it seems to be, January to June/July. And
12 then I -- it makes sense July would have been the
13 last -- or June of 2022, sometime there around.

14 Q. Okay. The last -- when -- basically, I would
15 say that once you hired counsel, that was the end of
16 our -- of your direct communication to me?

17 A. That sounds logical.

18 Q. That's the record I show.

19 And now, I reached out to you in October of
20 2022 and sent you several text messages.

21 Do you remember that?

22 A. If it's the texts, yes.

23 Q. That --

24 A. The big ones? Two --

25 Q. There was 2022 and 2024.

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1 A. Oh, I don't remember the 2022 ones.

2 Q. That's okay.

3 Let's specifically move forward to 2024. Now,
4 these are the text messages that I sent to you on
5 October 12th of twenty twenty -- 2024; correct?

6 A. Yes. Same -- let me see. Of course they are.

7 Q. Yeah.

8 A. Yeah, they are.

9 Q. I am going to ask you -- when you received
10 these messages was it upsetting?

11 A. Yes. Yes, it was.

12 Q. You and I had known each other closely, we've
13 established, for a long time?

14 A. Yes.

15 Q. When we were friends did I ever give you a
16 reason to feel as if I was a physical threat to your
17 safety?

18 MR. HARRISON: Objection. Vague. Calls for
19 speculation.

20 To the extent you think you can answer the
21 question, go ahead.

22 THE WITNESS: No. No.

23 BY MS. RICHARDSON:

24 Q. Did I ever express violence towards other
25 people, that you can remember?

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1 A. No.

2 Q. Do you think of me as a violent person?

3 MR. HARRISON: Objection. Calls for
4 speculation.

5 You talking about currently?

6 BY MS. RICHARDSON:

7 Q. Have you ever thought of me as a violent person
8 or -- prior to this time?

9 A. Prior to those texts, no.

10 Q. I'm -- I'm going to -- in my deposition we
11 focused on a specific carve-out of these texts, and I
12 want to say -- I know this probably isn't the
13 appropriate forum -- I'm really sorry.

14 A. Thank you.

15 Q. There were a number of text messages in this
16 thread that were -- I would say all together it -- it --
17 anyone can read them and agree it's disturbing. The
18 text message thread began, "Because of you, I have lost
19 everything and you decided to sue the person who had
20 nothing left to lose. How do you think this ends? Do
21 me a favor. Tell your lawyers to respond to my request.
22 I never been more destroyed. Don't underestimate what
23 that looks like. I loved you more than anything, and it
24 was purer than the purest. These were your decisions.
25 And Jesus fucking Christ, they're all documented. What

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1 the fuck."

2 Now, from there I moved to asking you to kill
3 me. From asking you to kill me, I moved back to, "I
4 loved you. I really fucking did. I can count on one
5 hand how many people I have loved in my life, and you
6 are one. Please, please do something good with your
7 life. Please, please, please. Don't ever speak to me
8 again; but honor that love with something for someone,
9 please. Please. You are good. You are kind. I know
10 this. Please be more than your money. Never see me or
11 talk to me; but help one animal, one person, one
12 ecosystem. I don't care. Please. I'm sorry. I'm
13 hurt. I'm broken. You broke me. Mission accomplished.
14 I love you. I tried" -- it says "I tired," but that's a
15 typo.

16 A. Yeah.

17 Q. I -- also tired.

18 "I now have nothing left. Nothing. Please,
19 please kill me. Please. I beg you, just fucking do it
20 already. Just kill me. It's better for you. It's
21 better for me. Please. Just have mercy and get it over
22 with. Send someone over with a fucking gun before I
23 speak to the press. Fuck you. I loved you. I have the
24 fucking receipts. You want to destroy me, then just do
25 it already."

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1 And then some expletives that are awful and at
2 the end a series of about like 20 pleases and I say,
3 "I'm so hard" -- "I tried so hard" -- "I'm so sorry. I
4 tried so hard. I tried to fix it. I was scared. I
5 tried. I didn't want to fail you. I tried with
6 everything I had. I just wanted you to win. That's the
7 only truth. I loved you. I'm sorry I didn't win."

8 Can you tell me about what you felt when you
9 read those text messages.

10 A. I felt -- I felt frightened, and I felt
11 unnerved. I felt sorry for you, and I felt like you
12 were -- it felt to me like -- like you were maybe --
13 like that you were unhinged, and it made me very
14 nervous.

15 Q. Yeah.

16 A. It made me very, very nervous because I
17 could -- I felt that you had -- you -- really felt you
18 had nothing to lose; and when someone's got nothing to
19 lose, they've got nothing to lose and it -- they
20 don't -- they don't want -- they -- those are often
21 situations where other people get taken down along the
22 way because they've got nothing to lose and -- and I was
23 concerned.

24 Q. Did you -- I -- I asked for you to hurt me, and
25 you perceived that as a physical threat to your safety.

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1 Can you explain to me why that was.

2 A. Because they were so violent.

3 Q. Okay.

4 A. Because they were just so violent and it -- it
5 wasn't like the Ashley that I'd known and because it
6 seemed like you were not -- you were not well.

7 Q. Yeah.

8 A. That -- the violent -- the violent undertones
9 and feeling like that you weren't -- you weren't the
10 Ashley I knew and you definitely didn't feel -- seem in
11 good mind to me -- and spirit.

12 Q. Uh-huh.

13 A. And -- and then I thought -- and I -- and I
14 also felt threatened because you know how -- how private
15 I am and my family -- I've been all -- my whole life and
16 when you, like, are talking about going to go to the
17 press and bring it on, it just -- it -- it just felt --
18 it felt unnerving. It felt --

19 Q. It must have.

20 A. -- frightening and unnerving, quite honestly.
21 I was -- we were sitting in London; so if I had been
22 sitting in L.A., it would have been a whole different
23 story, you know. At least I was farther across the
24 pond.

25 Q. Do you -- are you -- are you aware now that I

Page 172

1 had a relapse on that day?

2 MR. HARRISON: Objection --

3 MS. RICHARDSON: Sorry --

4 MR. HARRISON: -- testifying.

5 BY MS. RICHARDSON:

6 Q. Are you -- are you aware that when you sent
7 those text messages now that I was under the
8 influence -- heavily under the influence?

9 MR. HARRISON: Objection as -- calls for
10 speculation --

11 MS. RICHARDSON: Okay.

12 MR. HARRISON: -- testifying.

13 THE WITNESS: Yes. I know -- I know that's
14 your evidence, and so I -- I can't say for a fact,
15 obviously; but I know that that's -- that's -- that's
16 your evidence, so --

17 BY MS. RICHARDSON:

18 Q. You -- you stated that this is not the version
19 of me you knew, and I want to know if you had concern at
20 that point for my well-being at all.

21 A. As I said, I was --

22 MR. HARRISON: Objection. Objection.

23 BY MS. RICHARDSON:

24 Q. Okay. Do you think that the impact of this
25 process played a role in this breakdown that I had --

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1 MR. HARRISON: Objection --

2 BY MS. RICHARDSON:

3 Q. -- in October of 2024 --

4 MR. HARRISON: -- calls for speculation.

5 I don't know how you could possibly answer
6 that; but if you think you can answer it, go ahead.

7 THE WITNESS: I would be presuming, and I would
8 be speculating, but it would be -- it also could be
9 easily a conclusion that one could come to, myself
10 included.

11 BY MS. RICHARDSON:

12 Q. At least partially.

13 A. It's stressful. It's -- it's a lot.

14 Q. Has this process -- you know, I think -- okay.
15 Let me -- that's just --

16 A. Yeah.

17 Q. -- speculative.

18 MR. ANDRE: Give me one second, please.

19 BY MS. RICHARDSON:

20 Q. This text message said -- that I sent to you,
21 had I -- had I sent text messages like that to you
22 previously?

23 A. No.

24 Q. And -- and after this window of time, did I
25 send you any additional text messages similar to this or

Page 174

1 any text messages at all?

2 MR. HARRISON: Sorry. Can I just interrupt one
3 second.

4 MS. RICHARDSON: Oh, sorry.

5 MR. HARRISON: Can you just plug that in down
6 there. I'm about to lose power. Thank you.

7 Just for the record, Mr. Andre is leaving --

8 MS. RICHARDSON: We're staying on the record.
9 Yeah.

10 MR. HARRISON: -- another thing that he's got.
11 He'll come back, hopefully.

12 MR. ANDRE: Yes.

13 THE WITNESS: Would it be possible to ask one
14 of them for a chamomile -- a cup of tea -- a chamomile
15 tea?

16 MR. TAFOLLA: I can make that happen.

17 THE WITNESS: Could you? Does anyone want one?

18 MR. HARRISON: I'm good.

19 THE WITNESS: That's okay. Anything.
20 Chamomile -- anything herbal, please. Thank you.

21 BY MS. RICHARDSON:

22 Q. So I was saying, did I send you any text
23 messages after this?

24 A. No.

25 Q. Is it fair to say that this was an isolated

Page 175

1 incident?

2 A. Yes. I'd never received texts like that
3 from -- from you.

4 Q. And is it correct that these text messages came
5 in a short time period?

6 A. Yes, it's correct.

7 Q. Okay. I want to move for a moment now back to
8 the earlier part of our friendship.

9 A. Can I also add something? I knew it was a
10 question -- a few ago --

11 MR. HARRISON: Sure.

12 THE WITNESS: -- about whether I was concerned.

13 BY MS. RICHARDSON:

14 Q. Yeah. Of course.

15 A. I was concerned for you.

16 Q. Do you need to take a break? Are you okay?

17 A. I'm okay. I'm totally fine.

18 Q. Okay. Actually, let's just finish this. I was
19 going to change topics to lighten it, but I think it
20 lightens it anyway.

21 A. Just do it.

22 Q. You -- you filed a protective order against me
23 after I sent those text messages, and so did your
24 daughter; correct?

25 A. Yes.

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1 Q. And you filed that protective order in Monterey
2 County; correct?

3 A. I filed it in California.

4 Q. Yes.

5 A. The lawyers filed it; so I'm assuming wherever
6 it was filed, it was filed in California somewhere.

7 Q. And I filed a response that acknowledged the
8 severity of the text messages but affirmed my history
9 and -- and the circumstances.

10 Do you remember that?

11 MR. HARRISON: Objection --

12 MS. RICHARDSON: Okay.

13 MR. HARRISON: -- to the characterization.

14 BY MS. RICHARDSON:

15 Q. That restraining order was dismissed; correct?

16 A. I don't know whether it was dismissed or we let
17 it go because I was living in England. I can't recall.
18 It was one or the --

19 Q. I think both are true.

20 You -- sorry.

21 A. That's okay.

22 Q. Okay. I want to talk for a moment about the
23 time period of the market crash where you said I
24 communicated less with you.

25 MR. HARRISON: Which market crash we talking

Page 177

1 about?

2 MS. RICHARDSON: 2021 -- or sorry. 2022. The
3 beginning of 2022.

4 BY MS. RICHARDSON:

5 Q. Do you recall a Zoom meeting that we had with
6 Tushar Agarwal in January of 2022?

7 A. That was with Lieh; right?

8 Q. Uh-huh. Yeah.

9 A. Yes.

10 Q. It was in response to Lieh sending me an email
11 saying he wanted to get a handle on the stake tokens.

12 Does that ring a bell?

13 A. Yes. Yes. He was trying to get a handle point
14 on, at that point, all my crypto before -- tax season
15 was fast approaching.

16 Q. Were you aware -- you have a -- I don't know
17 his exact title -- a accountant or financial accounting
18 representative, Jack --

19 A. Jack Rodor [phonetic].

20 Q. What is his title?

21 A. He was financial consultant. He wasn't
22 full-time.

23 Q. Oh, okay.

24 A. Yeah. Didn't have a specific title --

25 Q. Were --

Page 178

1 A. -- that I recall.

2 Q. Were you aware that he wrote to me in February
3 of 2022 and said, We need \$20 million to pay Taylor's
4 taxes?

5 A. No.

6 Q. You weren't aware of that? I don't think
7 you -- you were not cc'd, so...

8 A. Yeah. I mean, because all the financials --
9 the financials and -- the tax people would do the tax,
10 the financial people did the financials, and everything
11 was always complicated. So it's -- it's definitely not
12 an area I was, you know, in the weeds on.

13 Q. Around the time that Jack emailed me telling me
14 that he needed money for your taxes, the crypto market
15 was descending because it was -- it was the winter of,
16 you know, 2022.

17 Does that sound about right to you?

18 MR. HARRISON: Objection. Compound.

19 MS. RICHARDSON: Okay.

20 MR. HARRISON: Assumes facts not in evidence.

21 MS. RICHARDSON: Understood. Let me rephrase
22 the question.

23 BY MS. RICHARDSON:

24 Q. Did you ever communicate to me that I would be
25 responsible for generating or passing income to pay for

Page 179

1 your taxes?

2 MR. HARRISON: Objection. Vague.

3 I'm not sure I understand. What do you mean
4 "passing income"?

5 BY MS. RICHARDSON:

6 Q. Did you ever communicate to me that I was
7 responsible for --

8 A. No.

9 Q. -- holding money for your -- to pay for your
10 taxes?

11 A. No. And I can't think how Jack would have
12 thought or presumed or -- thank you. Thank you so much.

13 Like, it's -- it's kind of -- it's bizarre.

14 Thank you.

15 Q. Is it reasonable that an email like that might
16 have been disturbing to me?

17 MR. HARRISON: Objection. Calls for
18 speculation on two levels. There's facts that have not
19 been introduced --

20 MS. RICHARDSON: Okay. That's fair.

21 MR. HARRISON: -- into evidence.

22 BY MS. RICHARDSON:

23 Q. If you had received an email like that, would
24 it have been upsetting to you?

25 MR. HARRISON: Objection. Calls for

Page 180

1 speculation.

2 MS. RICHARDSON: That's fine.

3 THE WITNESS: Should I answer?

4 MS. RICHARDSON: Yes.

5 MR. HARRISON: I don't know how you could, but
6 if you -- if you can --

7 THE WITNESS: It's a hypothetical.

8 BY MS. RICHARDSON:

9 Q. So let's -- let me rephrase it. Let me
10 rephrase it.

11 A. I --

12 Q. Let's -- let -- withdrawn. You were not aware
13 of that. That's fine. We'll leave it at that.

14 A. I was not aware of that; and to answer, I would
15 have thought, yes, you probably -- if you believed that
16 was your responsibility, you probably would have been
17 upset. And if I were in your position and I received
18 that, I'd be wondering what the heck was going on and I
19 would be confused.

20 Q. There was a period -- when we made the
21 Persistence transaction, that was a fairly
22 straightforward transaction.

23 Would you agree?

24 A. Yes.

25 Q. There was a contract, and it was very clear the

Page 181

1 amount that was purchased for the amount in Bitcoin?

2 MR. HARRISON: Objection.

3 MS. RICHARDSON: Sorry.

4 BY MS. RICHARDSON:

5 Q. The accounting on the Bitcoin -- or sorry -- on
6 the Persistence purchase was very clear; correct?

7 A. As I --

8 MR. HARRISON: Objection.

9 Go ahead. You can try and answer.

10 THE WITNESS: Well, my -- don't know whether
11 this the answer to the accounting on it, but my
12 understanding was we literally took the value that --
13 that -- the Persistence -- the Persistence value of \$5
14 and the number of shares -- or the number -- or the
15 money -- we actually took, yeah, the -- the price of \$5,
16 and it was going to be 40 -- or 20, two tranches, the
17 point is, and just divide it by the current price of
18 Bitcoin that we pegged the day. Right.

19 BY MS. RICHARDSON:

20 Q. So that was the benefit of having an
21 over-the-counter purchase?

22 A. Locked-in price.

23 Q. Now --

24 A. Sorry.

25 Q. -- when it came time to purchase the other

Page 182

1 altcoins, were you aware that every altcoin that you
2 wished to purchase I attempted to purchase over the
3 counter so we could have a similar arrangement?

4 MR. HARRISON: Objection. Compound.

5 THE WITNESS: No, I wasn't aware of that.

6 BY MS. RICHARDSON:

7 Q. I want to be clear.

8 Were you aware that when I reached out to these
9 crypto companies, I was not looking for staking or a
10 discount? I just wanted a set price to purchase so that
11 you could have a clean accounting?

12 MR. HARRISON: Objection. Vague.

13 I don't understand.

14 MS. RICHARDSON: Okay. That's fine. Let me --
15 let me rephrase it -- I'm going to go at it a different
16 way.

17 BY MS. RICHARDSON:

18 Q. It is -- just so that -- I just want to put
19 this on the record.

20 Aside from the fact that I'm not a lawyer, I
21 think we can agree that cryptocurrency is very complex;
22 so I'm going to do my best to try to frame these
23 questions in a way that is clear.

24 A. Yeah.

25 Q. But because there are so many moving parts, it

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1 makes it hard I think even for the most seasoned
2 professional to understand -- I can say that for myself,
3 and I feel like I have a pretty good grasp on it. I
4 apologize if I'm not clear to both of you, but we are --
5 we are now in this territory that is -- is -- is vague
6 on a good day, so I will do my best.

7 A. Uh-huh.

8 Q. There were a number of small-cap coins in the
9 fall that you wanted to purchase, and is it fair to say
10 those amounts exceeded -- the total purchases exceeded
11 \$1 million when I -- when I was making those purchases?

12 Is it fair to say there were a number of
13 purchases that were approximately \$10 million purchases?

14 MR. HARRISON: I'm sorry. What time period,
15 and how many?

16 MS. RICHARDSON: We're talking about -- we're
17 talking about September through December of 2021.

18 MR. HARRISON: And are you -- are you asking
19 her how many \$10 million-plus purchases there were?

20 MS. RICHARDSON: No. No.

21 BY MS. RICHARDSON:

22 Q. I'm asking -- I'm asking, do you remember me
23 making -- executing purchases for small-cap coins --

24 A. Yes. I remember you purchasing small-cap
25 coins.

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1 Q. Okay. Do you remember me explaining to you
2 that because I was buying them on the open market, while
3 purchasing them it would change the price?

4 MR. HARRISON: Objection.

5 You can answer, if you know, if you can -- if
6 you can answer that.

7 THE WITNESS: I don't specifically remember
8 the -- the moment, but I know we had discussions
9 about -- because it's common sense the price would
10 fluctuate if you're buying a small coin on the open
11 market.

12 BY MS. RICHARDSON:

13 Q. Do you remember me having to purchase
14 incrementally sometimes over days so to not change the
15 price?

16 A. Yeah -- you can -- sorry. Sorry.

17 MR. HARRISON: You can -- I have no objection.

18 You can try and answer it, if you know.

19 THE WITNESS: I -- I do recall that they
20 were -- that many of them were to be staggered, which is
21 what Genesis and Anchorage used to also do, even, you
22 know.

23 BY MS. RICHARDSON:

24 Q. And were you aware that some days I would be
25 making hundreds, if not thousands, of purchases

Page 185

1 throughout the day on different -- okay.

2 A. No, I wasn't. Because I wasn't there and you
3 were doing them.

4 Q. Yeah. Can you -- is it reasonable to assume
5 that that might have been a stressful process in and of
6 itself?

7 MR. HARRISON: Objection. Calls for
8 speculation.

9 BY MS. RICHARDSON:

10 Q. Your limited knowledge of crypto and the -- we
11 discussed earlier the losses that can happen with
12 cryptocurrency --

13 A. Uh-huh.

14 Q. -- is it reasonable to assume that the movement
15 of cryptocurrency can be stressful?

16 MR. HARRISON: Objection. Vague.

17 Stressful -- the movement of cryptocurrency can
18 be stressful for who?

19 BY MS. RICHARDSON:

20 Q. The movement of cryptocurrency is high-risk
21 because if you have one number wrong in the blockchain,
22 you could lose your money. There's no -- there's no
23 recouping lost cryptocurrency, for the most part; is
24 that correct?

25 MR. HARRISON: Objection. Calls for

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1 speculation. I think legal conclusion. I'm not sure.

2 But if you think you can answer, give it a
3 shot.

4 THE WITNESS: That -- hold on. That that --
5 yeah. That once one loses cryptocurrency, one can't get
6 it back, basically.

7 BY MS. RICHARDSON:

8 Q. If you lose --

9 A. -- on your wallet. Absolutely.

10 Q. Okay. So if a single transaction carries that
11 risk, can you see how hundreds of transactions in --
12 in -- in a short period of time could be exponentially
13 stressful?

14 MR. HARRISON: Objection. Calls for
15 speculation.

16 THE WITNESS: Should I be answering if I just
17 have a guesstimate on it --

18 MR. HARRISON: It doesn't have anything to do
19 with privilege, so -- the problem is it's a
20 hypothetical.

21 THE WITNESS: It's hypothetical but --

22 MS. RICHARDSON: You have to --

23 THE WITNESS: I would imagine --

24 MR. HARRISON: -- speculation.

25 But if you can't answer it, you can't answer.

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1 But if you can, you need to try to answer it.

2 THE WITNESS: I would say hypothetically it
3 would -- it would follow; it would make sense.

4 BY MS. RICHARDSON:

5 Q. Okay. Now, during this time period when these
6 purchases were taking place, did you communicate to me
7 expectations to have a thorough accounting of all of
8 these purchases?

9 MR. HARRISON: Objection. Vague.

10 BY MS. RICHARDSON:

11 Q. At any time did you express to me an
12 expectation to have accounting for these purchases?

13 A. To clarify, I actually did because you were
14 entrusted with an awful lot of money; and what I didn't
15 understand was how many of these small -- how many
16 trades that were being -- how many transactions were
17 being executed --

18 Q. Okay.

19 A. -- which --

20 Q. Let me ask -- let me ask the question again.

21 Did you ever give me specific -- did you ever
22 communicate to me specific expectations in relation to
23 accounting?

24 MR. HARRISON: Objection to how it's phrased
25 because that's a different question. It's not the same

Page 188

1 question.

2 MS. RICHARDSON: Okay.

3 MR. HARRISON: To the extent you think you can
4 answer --

5 THE WITNESS: I -- well, firstly, it was
6 implicit that if you were trading, you would be keeping
7 track. I wouldn't have thought I'd have to say, Can you
8 please make sure you make -- keep track.

9 But also, I -- I'd given you instructions to
10 keep an accounting because we were going to have to move
11 it over in the first few months of the year to Saffery's
12 and we need accounting.

13 And moreover, the tax people wanted an
14 accounting of it; and you were the only one that was in
15 the position to be doing that. It was -- we all thought
16 that that's what you were doing when you were buying and
17 selling, that you would keep -- keep a note, you would
18 keep -- you would keep a ledger, an accounting, so that
19 we knew where we were.

20 BY MS. RICHARDSON:

21 Q. At what point did you express that to me?

22 A. As a sit-down conversation of the ground rules,
23 I think it was always understood because it seems
24 pretty -- pretty implicit and it seems pretty obvious.

25 Q. Did -- did we have a sit-down conversation --

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1 A. Since we --

2 Q. -- about ground rules?

3 A. No. Because you were trading. You were happy
4 to be trading and handling the crypto, and part of
5 handling it is also managing and keeping track of the
6 financials.

7 Q. Based on -- based --

8 A. Anchorage and Genesis would all have an
9 accounting if I would have needed to know where we were.
10 It wouldn't occur to me that they wouldn't have had the
11 numbers if we said, What do -- what do I have in this?
12 What do I have in that?

13 It's like, Oh, you know, we didn't think we
14 were meant to keep track.

15 Didn't make sense.

16 Q. That's a great point.

17 And -- and I would say that -- would you agree
18 that there was a pretty substantial difference between
19 me being your friend and helping you trade crypto than,
20 let's just say, a financial institution like Anchorage
21 or Genesis?

22 MR. HARRISON: Objection. Vague.

23 THE WITNESS: Obviously, you were very
24 different in the sense that you were excited to be
25 handling the crypto and you said that you were doing

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1 this all the time, all day long and this would be no big
2 deal to do it -- that's how you originally walked into
3 this -- and that you would be honored and thrilled to do
4 it because it was down your rabbit hole and you had --
5 you got experience -- more experience doing it. So --
6 and I had no idea how many trades -- the trades that
7 turned out were happening were just, to me,
8 unfathomable, had zero idea, which is why I never
9 understood when you would say -- Michelle would say it
10 took so long.

11 BY MS. RICHARDSON:

12 Q. So to be clear -- to be clear, you -- you never
13 expressed that you expected me to have an accounting
14 and -- but you -- you always expected that; is that
15 correct? You're saying that now?

16 MR. HARRISON: Objection. Vague --

17 BY MS. RICHARDSON:

18 Q. Okay. Let me -- let me rephrase the question.
19 Let me -- let me step back for a second.

20 During this time period, I was clearly
21 extremely -- let me rephrase this.

22 We have already established earlier in this
23 deposition that I was not a formal fiduciary; is that
24 correct?

25 MR. HARRISON: Objection to form.

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1 BY MS. RICHARDSON:

2 Q. We -- there -- there was no written agreement
3 between us; is that correct?

4 MR. HARRISON: Objection to vague.

5 You can try and answer.

6 THE WITNESS: There was no written agreement
7 for anything. Not the finder's fee. There was no
8 written agreements; right? So --

9 BY MS. RICHARDSON:

10 Q. And during --

11 A. And it would be unfathomable to think that
12 anyone would give that amount of money to someone to
13 just be spending it on crypto and not keeping an
14 accounting of it. It's -- it's -- it's
15 incomprehensible, in my mind. I can't imagine anybody
16 that would think that was acceptable and normal because
17 it would defy logic, especially knowing that there is
18 going to be accounting that's going to be necessary in
19 the next few months for taxes and --

20 Q. Right.

21 A. -- and -- and in general.

22 Q. And it's fair to say that -- you've already
23 agreed, I was not being compensated for any of this work
24 that I was doing for you -- correct? -- financially?

25 MR. HARRISON: Objection. Vague.

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1 When you say --

2 MS. RICHARDSON: Were you -- were you --

3 MR. HARRISON: -- talking about --

4 THE WITNESS: Okay. You weren't my employee.

5 BY MS. RICHARDSON:

6 Q. I was not your employee.

7 Now, let me ask you this.

8 Are you -- Anchorage and Genesis were paid for
9 their services. You're aware of that; correct?

10 MR. HARRISON: Objection. Asked and answered,
11 I believe.

12 BY MS. RICHARDSON:

13 Q. We've established that Anchorage and Genesis
14 were paid for services --

15 MR. HARRISON: Objection. That's -- misstates
16 her prior testimony, I believe.

17 MS. RICHARDSON: Okay.

18 THE WITNESS: Yeah. We went -- I specifically
19 had a very special deal with generous -- Genesis, and I
20 don't know what Anchorage ended up doing, but their deal
21 was favorable because they wanted me as their client.

22 BY MS. RICHARDSON:

23 Q. Well, I -- Anchorage was being paid over 1
24 percent to hold your crypto, and they were paid on
25 transactions. But regardless of that, you expected